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5/11/90
DEPOSITION TRANSCRIPT
Donna Xervin Uchniat
177931

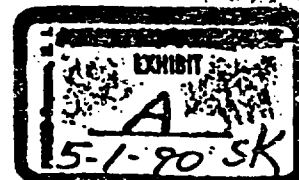
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

In the Matter of:)	Information Request Pursuant
)	to Section 104(e) of the
G & H Industrial Fill Company)	Comprehensive Environmental
Shelby Township, Michigan)	Response, Compensation and
)	Liability Act of 1980, 42
)	U.S.C. §9604

Dorothy Uchniat, being first duly sworn, upon her knowledge, memory and belief, answers the requests herein as follows:

1. 1956 to November, 1974.
2. None available due to fire destruction of the G & H Land Fill business office which occurred on December 27, 1974.
3. The site, which included a residence, was used, from 1956 to 1974 as a solid and liquid waste disposal area.
 - A. Leonard Forester, of Utica, Michigan, was the title owner.
 - B. Lease terminated in 1980.
 - C. The title owner shared a percentage basis of the revenue generated at the site.
4. Walter D. Schaeffer, 1963-1973, Winding Road, Pontiac, Michigan.
Gary L. Kervin, 1956-1974, 5757 W. Utica Road, Utica, Michigan.
Robert Gritzinger, 1970-1974, Hays Road, Washington Township, Michigan.
Gerald Vanepps, part-time 1965-1973, Auburn Road, Utica, Michigan.



Rex Edwards, 1973-1974, 23231 Geneva, Oak Park, Michigan.

Thomas Lanzon, 1958-1963, address unknown.

Jack Bartley, 1960-1964, address unknown.

Elizabeth Kerby, West Fox Lane, Apartment 101, Building
10, Utica, Michigan.

Harvey Kervin, 1956-1963, deceased.

Walter Uchniat, 1964-1974, deceased.

Dorothy Uchniat, 1956-1974

5. Sole proprietorship; Harvey Kervin (deceased) and Dorothy
Kervin; 1956 to 1963; sole proprietorship; Walter Uchniat (deceased)
and Dorothy Kervin Uchniat; 1964 to 1974.

6. Liquid Wastes:

Acme Paint Company, Detroit, Michigan;

Ford Motor Company, Sterling Heights, Michigan;

Thompson Products, Warren, Michigan.

7. Ford Motor Company and Thompson Products delivered cooling
and/or cutting oils to the site by railroad tank cars. Ford delivered
approximately 150,000 gallons per week from 1958 to 1968. Thompson
Products delivered cooling oils of approximately 10,000 gallons
per week from 1958 to 1968. Acme Paint delivered sludges by truck,
quantity unknown.

8. Solid Wastes:

Chirco Homes

Plastic Trends

Canada Dry

Suburban Disposal

State of Michigan

Fern Hill Village Apartments

No. 200-40

Exhibits May 20, 1940

CERTIFICATE OF CO-PARTNERSHIP

NAME OF CO-PARTNERSHIP

Don Jackson Corp

CLERK'S OFFICE

Month County,

Indorsed and filed this 20th

day of May A. D. 1940

Arthur J. Miller

County Clerk

ASSIGNMENT OF STOCK SUBSCRIPTION RIGHT

We, LEO S. SCHROT, J. LYNN FEWLESS and ROSE WELDON, in consideration of One Dollar (\$1.00) to us paid, and for other good and valuable considerations, do hereby sell, assign, transfer and set over to the persons below named all our right, title and interest as subscribers to the capital stock of Shelby Improvement, Inc., a Michigan corporation, to the extent in each case of the number of shares set out opposite their names:

Harvey Kervin 190 shares

Leonard Forster 60 shares

and we do hereby request and direct the said Company by its proper officers to issue to the persons named certificates for said shares upon payment of the subscription price therefor.

IN WITNESS WHEREOF, we have hereunto set our hands and seals this 3rd day of August, 1955.

Leo S. Schrot
Leo S. Schrot

J. Lynn Fewless
J. Lynn Fewless

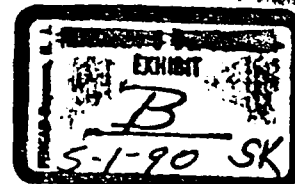
Rose Weldon
Rose Weldon

The undersigned do hereby accept the foregoing assignment and agree to assume and perform the conditions of the said subscription so assigned to them.

Harvey Kervin

Leonard Forster

DATED: August 3, 1955



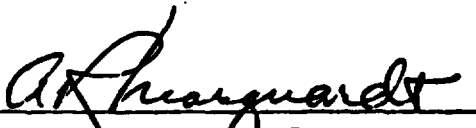
Macomb Disposal
Mid Eastern Disposal
Schoof Sanitation
Tringali Sanitation
R R White, Inc.
Avon Disposal
Beers Disposal
Shelby Township Residents
Oakland County Residents
City of Utica Residents
Liquid Wastes:
Art Winecki
Ford Motor Company
Daniel Winecki
Oscar Kramer Waste
Anco Industries
Justice
Al Schultz and Sons
Winkleman's
Thompson Products
Edward Winecki
Active Disposal
Retzlaff Refuse
B & B Trucking

A.R.I.S.T.O.

9. The records requested were destroyed in the fire described in Paragraph two (2) above.

Dorothy Uchniat
DOROTHY UCHNIAT

On this 20th day of JANUARY, 1983, before me
a Notary Public in and for said County and State, personally
appeared the above named DOROTHY UCHNIAT, being first duly sworn,
who deposes and says that she has read the foregoing Responses,
by her subscribed, and knows the contents thereof and that the
same are true of her own knowledge, except as to the matter which
are therein stated to be upon her information and belief, and
as to those matters, she believes them to be true.


Notary Public, MARQUARDT
Notary Public, Macomb County, MI
My Commission Expires: 11-25-85

Certificate of Co-Partnership

STATE OF MICHIGAN. }
COUNTY OF Macomb

Form No. 3320

THIS CERTIFIES THAT we, whose names are signed hereunder in full, are joined in co-partnership under the firm name of ABC Co. Rubbish Dump located at 3160-23 mile Rd. Utica, State of Michigan.
(Write on this line full name of your firm)
(Give name of town on this line and if you are located in a city or village having street address, give your street and number)

PRINT OR TYPE NAMES AND ADDRESSES OF CO-PARTNERS

NAME	STREET ADDRESS	CITY OR TOWN
<u>Harvey H. Kervin</u>	<u>3160-23 mile Rd.</u>	<u>Utica</u>
<u>Dorothy H. Kervin</u>	<u>3160-23 mile Rd.</u>	<u>Utica</u>

In Witness Whereof, We have this 24th day of May, 1963, made and signed this certificate.

This Certificate Expires Five (5) Years from the date of filing with the County Clerk.

SIGNATURES OF CO-PARTNERS

Harvey H. Kervin
Dorothy H. Kervin

STATE OF MICHIGAN. }
COUNTY OF Macomb

one of the co-partners of the said firm of ABC Co. Rubbish Dump, do hereby certify that all co-partners of said firm have herein above individually subscribed their respective names as witnessed by myself, and that the place of residence of each said co-partner as above written is true and correct.

(Signed) X Harvey H. Kervin
(One of the co-partners of above named firm)

Subscribed and Sworn to before me this 24th day of May, 1963.

Arthur R. Marquette
Notary Public, Macomb County, Michigan

My commission expires Aug. 24, 1965.

STATE OF MICHIGAN. }
COUNTY OF Macomb

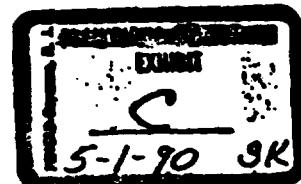
Clerk of the County aforesaid and Clerk of the Circuit Court for said County, do hereby certify that I have compared the within copy of Certificate setting forth the full names of the persons owning, conducting or transacting business under the name of ABC Rubbish Dump

together with the certificate of filing endorsed thereon, with the original Certificate heretofore filed and now remaining in my office, and that it is a true and correct copy thereof, and of the whole of such original Certificate and of said certificate of filing.

In Testimony Whereof, I have hereunto set my hand and affixed the seal of said Circuit Court, this 24th day of May, 1963.

Arthur J. Miller
By Arthur J. Miller

NOTE: This Certificate must be approved five (5) years from date of filing. If you go out of business you must file a Notice of Dissolution with the County Clerk. If you change your place of business you must notify the County Clerk.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

G & H INDUSTRIAL LAND FILL COMPANY
SHELBY TOWNSHIP, MICHIGAN

The Deposition of DOROTHY KERVIN UCHNIAT,
taken before Sandra L. Krisfalusi, a Certified
Shorthand Reporter and Notary Public, in and for the
County of Macomb, State of Michigan, at 135 North
Avenue, Mount Clemens, Michigan, on Tuesday the 1st day
of May, 1990, commencing at 10:15 a.m.

APPEARANCES:

WENDT, WENDT, VAN EMAN & CANDELA
Attorneys at Law
135 North Avenue
Mount Clemens, Michigan 48043
BY: MR. WILLIAM V. WENDT

Appearing on behalf of Dorothy Kervin Uchniat.

MS. LAURIE DONLON ADAMS
230 S. Dearborn Street
Chicago, Illinois 60604

Appearing on behalf of the United States
Environmental Protection Agency

MACOMB COURT REPORTERS, INC.
WILLIAM R. CARROLL & ASSOCIATES
MACOMB NEWS BUILDING
7 NORTH GRATIOT AVENUE - SUITE 102
MOUNT CLEMENS, MICHIGAN 48043
(313) 468-2411

ST. CLAIR COUNTY OFFICE: 400 BEERS ST., PORT HURON, MICHIGAN 48060 (313) 468-2411

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MACOMB COURT REPORTERS, INC.**WILLIAM R. CARROLL & ASSOCIATES****MACOMB MEWS BUILDING****7 NORTH GRATIOT AVENUE - SUITE 102****MOUNT CLEMENS, MICHIGAN 48043****(313) 468-2411****ST. CLAIR COUNTY OFFICE: 400 BEERS ST., PORT HURON, MICHIGAN 48060 (313) 468-2411**

1 Mount Clemens, Michigan

2 Tuesday, May 1, 1990

3 At 10:15 a.m.

4
5 DOROTHY FERVIN UCHNIAT,

6 Having been first duly sworn to tell the truth, the
7 whole truth, and nothing but the truth, testified as
8 follows:
9

10
11
12 MS. ADAMS: Okay. Mrs. Uchniat,
13 by being sworn it's just like being in a court of law.
14 You are obligated to tell the truth. I know we are
15 going to be asking you questions from quite a bit ago,
16 approximately 10, 15 years. If you don't know the
17 answer, feel free to say you don't know the answer, and
18 as Mr. Wendt indicated, please say yes or no. Gestures
19 cannot be recorded by the Court Reporter. If you need
20 to take a break please feel free to let me know you
21 want to take a break, and if you want to confer with
22 Mr. Wendt privately, just let me know and you can take
23 a few moments to go out in the other room and discuss
24 it with Mr. Wendt.

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THE WITNESS: All right.

MS. ADAMS: Do you have any questions?

THE WITNESS: No.

EXAMINATION

BY MS. ADAMS:

Q. I am going to just ask you to please state your full name for the record?

A. Dorothy Kervin Uchniat.

Q. What is your current address?

A. 45727 Mound Road, Utica, Michigan.

Q. Do you have any other places where you reside for more than two weeks at a time?

A. No.

Q. What is your educational background?

A. 9th grade.

Q. Are you currently employed?

A. No.

Q. Are you currently involved in any business of any type?

A. No.

Okay. Are you a part of the G & H Landfill?

Yes.

Q. What was your capacity there?

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1 A. I worked in the office.

2 Q. Were you the owner of the company?

3 A. Yes.

4 Q. And did you help operate the company?

5 A. My husband owned it.

6 Q. Also?

7 A. He passed away then I married again. He owned it and
8 he passed away then I took over.

9 Q. Okay. Could you state for the record your first
10 husband's name?

11 A. Harvey Hiram Kervin.

12 Q. How long did he operate the G & H Land Fill?

13 A. From 1956 to 1963.

14 Q. When did you marry again?

15 A. In '64.

16 Q. And whom did you marry then?

17 A. Walter Uchniat.

18 Q. And he then operated the site from 1964?

19 A. Yes.

20 Q. Now, if you could tell me a little bit about the
21 operation itself, what was the purpose of the business?

22 A. The purpose of the business?

23 Yes. What did you do, what did G & H Land Fill do?

24 A. We accepted trash. People brought it to us.

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- 1 Q. What types of trash, do you recall?
- 2 A. Well, solid waste..
- 3 Q. When you say "solid waste," what constituted solid
- 4 waste?
- 5 A. Paper, anything from offices, wood, tree stumps, things
- 6 like that.
- 7 Q. Did you accept any liquid waste?
- 8 A. Yes.
- 9 Q. What type of liquid waste did you accept?
- 10 A. I don't know.
- 11 Q. So you had no way of checking?
- 12 A. No way.
- 13 Q. How did you get some of the business that came your way
- 14 both the liquid and the solid waste?
- 15 A. You mean how did they come to me?
- 16 Q. Yes.
- 17 A. Well, they knew there was a Land Fill.
- 18 Q. Did you ever solicit any business?
- 19 A. Not that I can remember.
- 20 Q. Did you have anybody that did solicit business for G &
- 21 H Land Fill?
- 22 A. No.
- 23 Q. How did they know of G & H Land Fill's existence?
- 24 A. Through probably the telephone book. We had an ad in

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1 the phone book.

2 Q. Under the name of G & H Land Fill?

3 A. Yes.

4 Q. And what was the address that was stated?

5 A. 3160, 23 Mile Road, Utica, Michigan.

6 Q. Did you have any bank accounts for G & H Land Fill?

7 A. To take care of the business I did.

8 Q. Was it a checking account?

9 A. Yes.

10 Q. Did you have a savings account?

11 A. No.

12 Q. When people brought waste in to you, did they pay you?

13 A. I billed them, send them a statement and than they sent
14 me a check.

15 Q. Do you have any copies of the records that indicate the
16 billing process?

17 A. No.

18 Q. Do you have any records of the G & H Land Fill today?

19 A. No, I don't.

20 Q. Do you know what happened to those records?

21 A. They burned up in the fire.

22 Q. When was the fire?

23 A. 1974.

24 Q. Do you know what month?

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- 1 A. December.
- 2 Q. Do you know the cause of the fire?
- 3 A. No, I don't.
- 4 Q. Do you recall what the fire report stated as the cause
- 5 of the fire?
- 6 A. No, I don't.
- 7 Q. Was it a building that burned?
- 8 A. It was our office.
- 9 Q. When you say your office, is that where you conducted
- 10 your paperwork of the business?
- 11 A. Yes.
- 12 Q. And was that also located at 3160?
- 13 A. Yes.
- 14 Q. 23 Mill Road.
- 15 Q. Do you have any receipts of any kind regarding G & H
- 16 Land Fill?
- 17 A. None.
- 18 Q. Okay. Did you have a license to operate the G & H Land
- 19 Fill?
- 20 A. Yes, I did.
- 21 Q. Who gave you that license?
- 22 Macomb County.
- 23 Q. Did Shelby Township?
- 24 A. And Shelby Township.

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1 Q. So Shelby Township also gave you a license?

2 A. Yes.

3 Q. Did the State of Michigan give you a permit?

4 A. No.

5 Q. Were these licenses ever revoked?

6 A. No.

7 Q. Wer- you ever told that you could not accept any more
8 liquid waste?

9 A. No.

10 Q. Did you ever have a Court Order stating that you should
11 not accept liquid waste?

12 THE WITNESS: Bill, do you know
13 anything about anything?

14 MR. WENDT: The only case we had
15 was back in front of Judge Spire (sp), and we have to
16 refer to that record, but there was no prohibitions on
17 her at all, but we checked the record.

18 Q. (By Ms. Adams, continuing:) How long did G & H Land
19 Fill operate?

20 A. From 1956, I believe, to 1974.

21 Q. And why did you stop operation in 1974?

22 A. Well, we filled it.

23 Q. And what was your second reason?

24 A. And I had a bad heart and I was in the hospital a lot.

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1 of the time.

2 Q. Did you dissolve the G & H Land Fill at that time?

3 A. We dissolved -- I don't remember if it was '74 or not.

4 I can't tell you that, I don't remember.

5 Q. Did you sell G & H Land Fill to anyone?

6 A. No.

7 Q. Did you ever take any waste under the G & H Land Fill
8 that had been turned down at the LDI?

9 A. No.

10 Q. Were you on the site on a daily basis?

11 A. Pretty much so.

12 Q. And what was a typical day for you at the G & H Land
13 Fill?

14 A. What do you mean "a typical day?"

15 Q. How many loads of waste would come in and when it came
16 in what was the procedure?

17 A. I couldn't tell you that. It's been years.

18 Q. When somebody brought in a shipment, did you direct
19 them where to put the shipment of waste?

20 A. The men down the hill directed them where to put it.

21 Q. Were these men employees of G & H Land Fill?

22 A. Yes, they were.

23 Q. Did you hire these people?

24 A. Yes.

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1 Q. Do you recall how much waste came in on a day per
2 pound?

3 A. No.

4 Q. Do you have any idea per gallon?

5 A. No, I don't.

6 Q. When shipments came in to the G & H Land Fill, were you
7 aware that a shipment was being brought into G & H Land
8 Fill?

9 A. No. They just came during the working day. I mean I
10 never knew what was coming in.

11 Q. In what form did they come in?

12 A. Well, some of them brought it in the trunk of their
13 car, rubbish in the trunk of the car. Some of them
14 brought it in trucks. Some of them brought them in
15 trailers. Some of them brought them in barrels.

16 Q. Did anybody ever bring it in by railroad?

17 A. Yes.

18 Q. Do you know which railroad?

19 A. New York Central.

20 Q. Is New York Central affiliated with Penn Central?

21 A. I don't know.

22 Q. Do you know if it's affiliated with Con Rail?

23 A. I don't know.

24 Q. Okay. Do you remember who some of your, employee were?

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- 1 A. I could give you some of them; Bill Schaeffer,
2 Elizabeth Kerby, Robert Gritzinger, my son Gary
3 Kervin, Rex Edwards, and Charlie Bartley.
4 Q. Did you say Robert Gritzinger?
5 A. Yes.
6 Q. Did you say Elizabeth Kerby?
7 A. Yes.
8 Q. Did Trina Kervin ever work for you?
9 A. Yes.
10 Q. Is Gary Kervin your son?
11 A. Yes.
12 Q. Is Trina Kervin your daughter?
13 A. Yes.
14 Q. Were both of these children children of Harvey Kervin?
15 A. Yes.
16 Q. Was Gary Kervin an employee?
17 A. Yes.
18 Q. Did he help operate the G & H Land Fill?
19 A. Not really.
20 Q. Did Trina help operate the Land Fill?
21 A. No, she was an employee.
22 Q. Did you have an employee by the name of Jack Bartley?
23 A. Yes.
24 Q. Did you have an employee by the name of Thomas Lanzoni?

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1 A. Yes.

2 Q. Did you have an employee by the name of Big Ray?

3 A. Repeat that?

4 Q. Big Ray?

5 A. Oh, yeah.

6 Q. Do you recall Big Ray's full name?

7 A. Ray Harrison. His name would be Ray Harrison.

8 Q. Did you have an employee by the name of Dick Schore?

9 A. Yes. He's deceased.

10 Q. Did you have an employee by the name of John "Preacher"

11 Thomas?

12 A. Yes.

13 Q. Did you have an employee by the name of Gerald Vanepps?

14 A. Yes.

15 Q. Did any of these individuals work for the entire time
16 of the Land Fill operation?

17 A. You mean from the time it started?

18 Q. To the time that it closed?

19 A. No.

20 Q. Okay. I am going to go through each person and if you
21 would try to the best of your recollection, you could
22 tell me how long they worked for you and if you have
23 current address for that individual.

24 Charles W. Bartley?

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- 1 A. I couldn't tell you how long he worked for me.
- 2 Q. Can you give me -- was he there when the operation
- 3 started?
- 4 A. No.
- 5 Q. In 1954. Did he come on five years later?
- 6 A. I have no idea.
- 7 Q. Was he there at the conclusion of it?
- 8 A. No.
- 9 Q. Would it be fair to say that he worked for you sometime
- 10 in the 1960s?
- 11 A. Probably, yes.
- 12 Q. And was he employed with you one year?
- 13 A. He was employed with me longer than that, I think.
- 14 Q. Ten years?
- 15 A. No. Couple, maybe two or three years.
- 16 Q. Do you know where he is right now?
- 17 A. No, I don't.
- 18 Q. Do you know if he's in Michigan?
- 19 A. I don't know.
- 20 Q. Do you know if he's retired?
- 21 A. I don't know that either.
- 22 Q. Do you recall how long Jack Bartley worked for you?
- 23 A. Jack worked for a couple of years.
- 24 Q. Is he related to Charles Bartley?

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1 A. Yes, brothers.

2 Q. Do you recall when Jack Bartley worked for you?

3 A. Probably in the '70s, '60s.

4 Q. Do you know where he's located?

5 A. No, I don't.

6 Q. Do you know if he's retired?

7 A. I don't know that either.

8 Q. Do you know if either of the Bartley brothers are still
9 alive?

10 A. I don't know.

11 Q. Do you recall how long Rex Edwards worked for you?

12 A. Rex Edward worked for me about a year and that was in
13 the '70s.

14 Q. Do you know where he is?

15 A. No, I don't.

16 Q. Do you know if he's retired?

17 A. No, I don't.

18 Q. I know a lot of these question are repetitious for each
19 person, but bear with me. I know it's a little
20 aggravating.

21 Do you know where he lives at all?

22 A. No, I don't.

23 Q. How long did Robert Gritzinger work for you?

24 A. Bobby worked for me part-time. He was -- oh, I'd say

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1 he worked for me a couple of years.

2 Q. Do you know where he's currently located?

3 A. In Washington, Michigan, but I don't know his address

4 or anything.

5 Q. Okay. Thank you.

6 Do you know if he's still alive?

7 A. Yes.

8 Q. Do you recall when Robert Gritzinger worked for you?

9 A. Well, he worked for me in the '70s.

10 Q. Of the four gentlemen that we just went over, were all
11 of their duties and responsibilities of G & H Land Fill
12 the same?

13 A. No. Some of them did the bulldozer and some of them
14 drove the crane.

15 Q. Do you recall who drove the bulldozer?

16 A. Bobby Gritzinger.

17 Q. When you say drove the bulldozer, what was the
18 bulldozer driven for?

19 A. Covered the trash.

20 Q. Did you ever bury any drums on the site?

21 A. Yes.

22 Was there liquid contained in the drums that were
23 buried on the site?

24 A. No, they were empty.

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- 1 Q. Where were they emptied?
- 2 A. In the pit.
- 3 Q. Was the pit located on the G & H Land Fill?
- 4 A. Yes.
- 5 Q. How many pits were there?
- 6 A. One at a time. We did one, fill it and open another
- 7 one-
- 8 Q. Do you recall at the conclusion of the G & H Land Fill
- 9 how many pits existed on the site?
- 10 A. No, I don't.
- 11 Q. Were there a hundred?
- 12 A. No.
- 13 Q. Were there ten?
- 14 A. I don't know. I couldn't tell you exactly.
- 15 Q. So there were less than a hundred?
- 16 A. Oh, yes, way less than a hundred, I know that.
- 17 Q. Would it be less than fifty, do you know? It's just an
- 18 approximation.
- 19 A. No, I don't know. I really don't know.
- 20 Q. So it was probably between somewhere between fifty and
- 21 one-hundred?
- 22 A. Possible.
- 23 Okay.
- 24
- MR. WENDT: Or zero to fifty.

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1 assume that's possible too, as long as we are guessing.

2 Q. (By Ms. Adams, continuing:) Did Mr. Gritzinger ever
3 operate the crane?

4 A. Yes.

5 Q. Who else operated the crane?

6 A. Bill Schaeffer, my son Gary, Charles Bartley.

7 Q. What did the crane -- what was the crane used for?

8 A. Well, if there was a tree or anything in our way, they
9 wind the line around the tree and pull it right out of
10 the ground with a crane and they also dug the pits.

11 Q. Did Jack Bartly ever operate the crane?

12 A. Yes.

13 Q. Did he operate the bulldozer?

14 A. Yes.

15 Q. Did Rex Edwards operate the crane?

16 A. Yes.

17 Q. Did he operate the bulldozer?

18 A. Yes.

19 Q. The four gentlemen that we have been discussing, did
20 they do anything else besides operate the bulldozer or
21 the crane?

22 A. Operated the trash pack to pack the rubbish.

23 Q. Did they ever tell people bringing in the waste where
24 to put the waste?

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- 1 A. If they were down there at the time they brought it in.
- 2 Q. When a decision was made to put waste in a specific
- 3 area in a Land Fill, what was the basis of that
- 4 decision?
- 5 A. You mean who made the decision?
- 6 Q. Who made the decision?
- 7 A. Well, the men working down the hill, whoever was down
- 8 there.
- 9 Q. Why would they make a particular decision?
- 10 A. Well, they had to know exactly where everything went.
- 11 You couldn't put barrels with yard rubbish.
- 12 Q. So you had an area for drums or barrels?
- 13 A. Yes.
- 14 Q. Did you have an area for loose trash?
- 15 A. No. No, we had a buildup high and we keep pushing it
- 16 over.
- 17 Q. Would the drums be put in the same area?
- 18 A. No.
- 19 Q. So the drums would -- would the drums be kept separate?
- 20 A. Yes.
- 21 Q. And they would be kept separate from what?
- 22 From the dry rubbish.
- 23 Q. Was there a specific area on the Land Fill where the
- 24 drums are located?

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1 A. Yes.

2 Q. What area was that?

3 A. Along the railroad track on this side.

4 Q. On which side?

5 A. On our side of the fence. There's a fence down there.
6 There was a fence down there.

7 Q. Okay. Do you recall if that would be east, west,
8 north, south?

9 A. No, I don't.

10 Q. And where would you put the dry trash?

11 A. The dry trash, we had went all over. I mean we had an
12 empty space.

13 Q. Were there any other locations of the drums besides
14 next to the railroad on your side of the fence?

15 A. Not that I remember.

16 Q. When you said men working down the hill earlier, what
17 men were working down the hill?

18 A. My boys.

19 Q. The same four that we just recently discussed?

20 A. Yes.

21 Q. I would like to move on to some other people.

22 How long did Elizabeth Kerby
23 for you?

24 A. Oh, about three years.

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1 Q. Do you recall when?

2 A. In the '70s.

3 Q. What was her job?

4 A. Working in the office.

5 Q. What did her duties include?

6 A. Oh, billing, and, God, I don't know what else she did.

7 She didn't do a lot, to tell you the truth.

8 Q. Is she still alive?

9 A. As far as I know.

10 Q. Do you know where she's currently located?

11 A. No, I don't.

12 Q. Did you ever take any waste for cash?

13 A. Yes.

14 Q. Were a large number of your transactions involved with
15 cash?

16 A. No.

17 Q. Were most of the transactions involved in a billing?

18 A. Yes.

19 Q. Could you tell me a little bit about the procedure of
20 the billing?

21 A. Well, when they would bring a load in, certain
22 companies, they would sign a ticket, and we would
23 them a copy of the ticket and we keep one. At the
24 of the month we would bill them.

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1 Q. And these tickets, and the bills were all burnt in the
2 fire?

3 A. Yes.

4 Q. Was the building destroyed?

5 A. Most of it.

6 Q. What else was in the building?

7 A. Oh, all our check writer and our typewriter, and a
8 safe, but our safe was saved. Oh, there were a lot of
9 small things in there, a couch, a chair, refrigerator,
10 a stove. I mean we practically lived there.

11 Q. Were all the contents then destroyed?

12 A. Just about, yes.

13 Q. When you say you practically lived there, did you live
14 in that building?

15 A. No.

16 Q. Did you live at the site?

17 A. Yes.

18 Q. Was the home a separate building?

19 A. Yes.

20 Q. Did you do any work in the office building, other than
21 office procedures?

22 A. Well, I use to cook my lunch out there.

23 Q. When you took liquid waste, and I may be asking this
24 question a second time, I don't recall if I asked you

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1 earlier or not, do you remember the type of liquid
2 wastes that were brought there?

3 A. No, I don't.

4 Q. Do you recall if there were sludges, oil sludges?

5 A. I don't know what they brought. I don't know.

6 Q. Okay. Do you recall if any of them were paint thinners
7 or paints?

8 A. There was paint, yes.

9 MR. WENDT: Paint or paint
10 thinners?

11 THE WITNESS: Paint thinners and
12 paint.

13 Q. (By Ms. Adams, continuing:) Any of the waste liquid or
14 dry that came on to the site, was it all covered up?

15 A. You mean when it was brought in, immediately covered?

16 Q. Or within a reasonable --

17 A. During the course of the day.

18 Q. Did you burn any waste out there?

19 A. When we first started we did.

20 Q. What type of waste did you burn?

21 A. All dry rubbish, papers and woods.

22 Q. Did you have any contact with the LDI Land Fill?

23 A. No.

24 Q. Did any of the people who brought waste to LDI also

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1 bring waste to G & H?

2 A. I don't know.

3 Q. I want to go into a little bit about what your husband
4 did at the G & H Land Fill.

5 Your first husband, Harvey Kervin,
6 what were his responsibilities in operating the Land
7 Fill?

8 A. Well, he run the bulldozer, and he more or less
9 determined where things should go when they come in
10 there.

11 Q. When you say where things should go, we are going back
12 on the same basis that you stated earlier as to why
13 things would be placed in the Land Fill?

14 A. Right.

15 Q. What were the responsibilities of your second husband,
16 Mr. Uchniat at the site?

17 A. About the same things as my first husband did.

18 Q. Was Mr. Uchniat involved with the G & H Land Fill prior
19 to his marriage to you?

20 A. No.

21 Q. Let me go back and ask you about some more of the
22 employees.

23 When did Gary Kervin start working
24 for you at the G & H Land Fill?

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- 1 A. When it opened.
- 2 Q. How long did he work at the G & H Land Fill?
- 3 A. He worked for me from -- he only worked after school
- 4 because he was in school when we opened it, but he did
- 5 work there and he worked until it closed.
- 6 Q. Do you know his current address?
- 7 A. 5057 West Utica Road, Utica, Michigan.
- 8 Q. What were his responsibilities at the Land Fill?
- 9 A. He use to operate the crane. He use to repair tires or
- 10 what happened down there.
- 11 Q. Did he operate the bulldozer?
- 12 A. He could, yes. Yes, he did.
- 13 Q. Was he very active in the business?
- 14 A. Not really.
- 15 Q. Did he have another place of employment outside of G &
- 16 H Land Fill?
- 17 A. No.
- 18 Q. Was he in school from 1954 until 1976?
- 19 A. Well, I don't know. '74, I don't know. He came home
- 20 from school in '56 and go down the hill and work, but
- 21 he was born in 1942.
- 22 Q. Was Gary ever employed outside of the G & H Land
- 23 as he got older?
- 24 A. Yes.

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1 Q. What was his employment?

2 A. He was working for another Land Fill.

3 Q. Do you recall which Land Fill he worked for?

4 A. No, I don't.

5 MR. WENDT: Just for the record
6 are we talking about after yours closed?

7 THE WITNESS: Yes, after it
8 closed.

9 MS. ADAMS: Thank you.

10 Q. (By Ms. Adams, continuing:) Prior to it closing he
11 worked strictly for the G & H Land Fill?

12 A. Yes.

13 Q. Did he ever have his own business?

14 A. No. Well, yes, he did. Yes, after he got away from us
15 and quit working for that other dump, he went to D & D
16 Disposal.

17 Q. When did D & D Disposal exist?

18 A. Well, he had bought it from D & D, then he just
19 dissolved it, oh, a year or two ago. I think about two
20 years ago.

21 Q. When you say dissolved, did anyone purchase it?

22 A. No, he just...

23 Q. I am sorry. When did he buy the D & D Disposal?

24 A. I don't know.

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1 Q. Was it prior to 1974?

2 A. No.

3 Q. Do you remember from whom he purchased it?

4 A. Don Nider.

5 Q. Did you have an ownership interest in the D & D
6 Disposal?

7 A. No.

8 Q. When -- was it Nider?

9 A. Yes.

10 Q. When Mr. Nider operated the D & D Rubbish Disposal, did
11 he bring any waste on to the site?

12 A. Brought it to me?

13 Q. Yes.

14 A. Yes.

15 Q. Do you recall the type of waste he brought?

16 A. Household. Picked up stuff from houses.

17 Q. Is there any other type of waste that he brought over?

18 A. No.

19 Q. Was there any liquid waste that he brought over?

20 A. No.

21 Q. When did Trina Kervin start working for the G & H Land
22 Fill?

23 A. When she came home from school. She use to work in the
24 office.

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1 Q. What year did she start working for you?

2 A. I don't know.

3 Q. Did she start working for you in 1954.

4 MR. WENDT: '54? '56 is when they
5 started.

6 MS. ADAMS: I am sorry.

7 Q. (By Ms. Adams, continuing:) 1956?

8 A. I don't remember. I really don't remember when Trina
9 started working for me.

10 Q. Was she a teenager when she started working for you?

11 A. Younger.

12 Q. Did she have any responsibilities outside of the
13 office?

14 A. No.

15 Q. Did she work for you until G & H closed?

16 A. No.

17 Q. When did she stop working for you?

18 A. I don't remember when she stopped.

19 Q. You do remember that she started working for you before
20 1974?

21 A. Yes.

22 Q. Do you remember how long Thomas Lanzon worked for you?

23 A. No, I don't.

24 Q. Was it ten years? Was it five years?

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- 1 A. No, maybe three or four.
- 2 Q. Do you know where Mr. Lanzon is now?
- 3 A. No, I don't.
- 4 Q. Do you know if he's still alive?
- 5 A. I don't know.
- 6 Q. What were his duties?
- 7 A. Oh, covering the trash and he did a lot of cleaning up,
- 8 pick up the yard, pick up around the yard and pick up
- 9 paper around the Land Fill, clean up.
- 10 Q. Was he one of the men who worked down the hill that
- 11 made decisions about where the trash was suppose to go?
- 12 A. No.
- 13 Q. Do you recall how long Mr. Harrison worked for you?
- 14 A. Ray worked for me about five years, I think.
- 15 Q. What were his responsibilities?
- 16 A. Sometimes when they emptied the barrels down there in
- 17 the pit they dropped the barrels in the pit, and we
- 18 didn't like the barrels in there, so Ray would take
- 19 them out.
- 20 Q. Who would drop the barrels in the pit?
- 21 A. The people that were dumping them.
- 22 Q. Why didn't you want the barrels in the pits?
- 23 A. Because they took up too much room.
- 24 Q. How long did Mr. Schaeffer work for you?

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- 1 A. Oh, Bill worked for me for about five, six years.
- 2 Q. Excuse me. I want to go back to Mr. Harrison. I don't
- 3 believe I asked you if you knew where he's located?
- 4 A. No, I don't.
- 5 Q. Do you know if he's alive?
- 6 A. I don't know that.
- 7 Q. Okay. Going back to Mr. Schaeffer, what were his
- 8 responsibilities besides operating the crane?
- 9 A. Covering with the bulldozer, putting the cover on.
- 10 Q. Do you know where he's located?
- 11 A. In Pontiac.
- 12 Q. On Pontiac?
- 13 A. Pontiac, Michigan.
- 14 Q. That's a town in Michigan?
- 15 A. He's on Walding (sp) Road.
- 16 Q. How long did Mr. Schaeffer work for you?
- 17 A. About a year.
- 18 Q. Were his responsibilities the same as the other
- 19 gentlemen?
- 20 A. Yes.
- 21 Q. How long did Schore work for you?
- 22 A. About a year.
- 23 Q. Going back to Mr. Schaeffer, was he also one of the
- 24 people that made decisions about where the trash was

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1 suppose to go?

2 A. Yes.

3 Q. What were Mr. Schore's responsibilities?

4 A. About the same as the other ones.

5 Q. John Preacher Thomas, do you recall how long he worked
6 for you?

7 A. He picked scrap.

8 Q. What does that mean?

9 A. He picked up scrap along the dump there, like copper or
10 anything.

11 Q. And what did he do with it?

12 A. I guess he sold it to the scrap yard.

13 Q. Did you get any of the proceeds of that sale?

14 A. No.

15 Q. How long did he work for you?

16 A. He really worked for himself. He wasn't on my payroll.

17 Q. Do you know where he is?

18 A. No, I don't.

19 Q. Do you know if he's still alive?

20 A. I don't know that.

21 Q. How long did Gerald Vanepps work for you?

22 I don't know how long Gerald worked for me. I couldn't
23 tell you.

24 Q. Did he work with you for most of the time that you were

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1 in operation?

2 A. No. He worked part-time, really.

3 Q. Would you say he worked for you approximately four
4 years?

5 A. Probably. Could be. I really don't remember how long
6 he worked for me.

7 Q. Do you recall what his duties were?

8 A. Same as those other fellows there, covering, digging.

9 Q. When Mr. Uchniat took over the G & H Land Fill
10 business, how did he know how to operate it?

11 A. The men down in the field showed him.

12 Q. So your employees helped him out?

13 A. Yes.

14 Q. Did Mr. Uchniat have any type of business besides the G
15 & H Land Fill?

16 A. No.

17 Q. Did Mr. Kervin have any other business besides the G &
18 H Land Fill?

19 A. No.

20 Q. Would anybody else have any records regarding the G & H
21 Land Fill?

22 A. No.

23 Q. Did Gary Kervin keep any records of the Land Fill?

24 A. No.

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1 Q. Did Trina Kervin keep any records of the Land Fill?

2 A. No.

3 Q. Have you since located any records, other than the
4 that you have gave Mr. Wendt several years ago?

5 A. No.

6 Q. Do you have any pictures of the site?

7 A. No.

8 Q. Does anyone have any pictures of the site?

9 A. Not unless they would be in that.

10 MR. WENDT: Ms. Adams went through
11 the whole thing, so...

12 Q. (By Ms. Adams, continuing:) Who was your bank for the
13 G & H Land Fill?

14 A. NBD.

15 Q. Is NBD still in existence?

16 A. Yes.

17 Q. Does NBD stand for any?

18 A. National Bank of Detroit.

19 Q. Do you have any bank records?

20 A. No.

21 MR. WENDT: Are you talking about
22 G & H bank records?

23 MS. ADAMS: Correct.

24 MR. WENDT: Okay.

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1 Q. (By Ms. Adams, continuing:) Did you file a Federal
2 Income Tax return in 1989?

3 A. '89, yes.

4 MS. ADAMS: Would it be possible
5 for you to produce? Would you like us --

6 MR. WENDT: If I find some
7 relevancy to it for the 1989 income, I may produce it.

8 MS. ADAMS: Right. It's a
9 viability issue.

10 MR. WENDT: About what?

11 MS. ADAMS: About a potential
12 responsible party, which Mrs. Uchniat was.

13 MR. WENDT: So you want to know
14 how much money she makes?

15 MS. ADAMS: Right.

16 MR. WENDT: Why don't you ask her.

17 Q. (By Ms. Adams, continuing:) How much money do you
18 make?

19 A. If you got a hat, I will pass it around.

20 MR. WENDT: Are you on social
21 security? Tell her. This is the Government speaking
22 now.

23 (By Ms. Adams, continuing:) Excuse me. Do you have
24 any income?

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7 NORTH GRATIOT AVENUE - SUITE 102

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1 A. Social security.

2 Q. Is that your only income?

3 A. I have a couple investments, not big once, very little.
4 One I get five hundred and some dollars a month and the
5 other one I get six hundred and some dollars a month.

6 Q. Are these investments in companies?

7 A. No.

8 Q. Are they in stock?

9 A. No.

10 MR. WENDT: Go ahead, tell her.

11 THE WITNESS: Time saving
12 certificates.

13 MR. WENDT: Time saving
14 certificates.

15 THE WITNESS: And that's it.

16 Q. (By Ms. Adams, continuing:) Do you have any bank
17 accounts outside the United States?

18 A. No.

19 Q. Are you currently married?

20 A. No.

21 Q. Are you planning on staying in the home in which you
22 live?

23 A. Yes.

24 Q. You are not planning to move in the near future?

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- 1 A. No.
- 2 Q. Were any other businesses operated from the G & H Land
- 3 Fill?
- 4 A. No.
- 5 Q. Was D & D Rubbish Company ever operated from the G & H
- 6 Land Fill?
- 7 A. No.
- 8 Q. Was ABCO Rubbish Dump ever operated from the G & H Land
- 9 Fill?
- 10 A. No.
- 11 Q. Could you tell me what was the ABCO Rubbish Dump?
- 12 A. It's AMCO, A-m-c-o. It's not a rubbish dump, and he
- 13 use to bring barrels in.
- 14 Q. Did you ever have a business called ABCO Rubbish Dump?
- 15 A. No.
- 16 Q. Did Mr. Kervin ever have a business called ABCO Rubbish
- 17 Dump?
- 18 A. No.
- 19 Q. Did Mr. Kervin ever have ownership interest in a
- 20 company called Shelby Improvement, Inc.?
- 21 A. No.
- 22 Q. Have you ever heard of Shelby Improvement Inc.?
- 23 A. Never.
- 24 Q. Do you know who Leo Schrot is?

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- 1 A. Leo Schrot, he was my attorney.
- 2 Q. Do you know who J. Lynn Fewless is?
- 3 A. He was Leo Schrot's partner.
- 4 Q. Do you know who Rose Weldon is?
- 5 A. No.
- 6 Q. Did you own the property where the G & H Land Fill was
- 7 located?
- 8 A. No.
- 9 Q. Do you know who owned the property?
- 10 A. Leonard Forester.
- 11 Q. Did anybody else own the property?
- 12 A. No.
- 13 Q. Do you know Alexander Kofferson (sp)?
- 14 A. No.
- 15 Q. Were there ever any recreational vehicles stored on the
- 16 G & H Land Fill site?
- 17 A. No.
- 18 Q. Did Mr. Forester have any interest in the G & H Land
- 19 Fill?
- 20 A. Yes.
- 21 Q. Did he own shares?
- 22 A. No.
- 23 Q. Did he get a percentage of the proceeds?
- 24 A. A third of the net profit.

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1 Q. Now, Charles Bartley was an employee of yours; is that
2 correct?

3 A. Pardon?

4 Q. Charles Bartley was an employee of yours; is that
5 correct?

6 A. Yes.

7 Q. Did you ever have an agreement with him where he used
8 the railroad tracks for hauling?

9 A. I do not remember. I don't think so, but I am not
10 sure.

11 Q. Do you remember any type of business relationship with
12 him other than the fact that he was your employee?

13 A. No.

14 Q. Do you know Roger J. Quinn?

15 A. No.

16 Q. Do you know Thomas Cross?

17 A. No.

18 MR. WENDT: For the record,
19 they're both dead a long time, I remember the names, at
20 least ten years.

21 Q. (By Ms. Adams, continuing:) Did you pay rent to Mr.

22 Forester?

23 A. Yes.

24 Q. On a monthly basis?

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1 A. \$25.00 a month.

2 Q. Did he know the type of business you operated?

3 A. Yes.

4 Q. Did he solicit business for you?

5 A. No.

6 Q. Did he assert any control over the business?

7 A. No.

8 Q. Are you aware that the EPA is cleaning up the area?

9 A. Yes.

10 Q. Okay. When did you receive the notice for this
11 deposition?

12 A. Well, a week ago. I was suppose -- I forgot when it
13 was.

14 Q. But it was a couple of weeks ago?

15 MR. WENDT: Yes.

16 Q. (By Ms. Adams, continuing:) What did you do to prepare
17 for the deposition, if anything?

18 A. Nothing.

19 MR. WENDT: Talked to me.

20 THE WITNESS: I didn't have
21 anything to hide.

22 MR. WENDT: You talked to me
23 didn't you?

24 THE WITNESS: Yes, that's it.

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1 Q. (By Ms. Adams, continuing:) Were there any other
2 owners of the G & H Land Fill other than you and Harvey
3 and later you and Mr. Uchniat?

4 A. Nobody.

5 Q. Did Shelby Township ever assert any control over the
6 management operations of the G & H Land Fill?

7 A. No.

8 Q. Did they request that you accept waste from the Shelby
9 Township residents?

10 A. Yes.

11 Q. Did they allow you to charge a fee?

12 A. The first years we were not allowed to charge, but
13 later with Harvey Kervin we charged them twenty-five
14 cents a trunk load.

15 Q. How could they stop you from charging a fee?

16 A. They couldn't.

17 Q. So if you had chosen to charge a fee you could have
18 charged a fee during the time that you did not?

19 A. Yes.

20 MS. ADAMS: I would like to take a
21 fifteen minute break at this point, if that's all right
22 with Mr. Wendt.

23 (Off the record)

24 MR. WENDT: Back on the record.

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1 Just for the record, it's ten
2 after 11:00. We been at this for about an hour. I
3 want the record to reflect that back in 1983, in the
4 names of the G & H Industrial Fill Company Shelby
5 Township, Michigan, pursuant to an information request,
6 Section 104 (a) et cetera, et cetera, et cetera, that
7 Mrs. Wobniat filed with the EPA, a sworn statement
8 dated January 20th of '83, containing the employees,
9 solid waste names of people who contributed to the
10 waste, as well as liquid waste, and also reflecting
11 that all the records that G & H had were destroyed in
12 the fire in December of 1974.

13 This deposition shall be by law
14 considered in context with that Sworn Statement filed
15 seven years ago. That being the case, we wouldn't want
16 to be redundant to those matters which were explained
17 to the EPA seven years ago. Okay, so if we get to the
18 point of redundancy, I may have to suggest that we
19 refer to those things which have been in the control of
20 the EPA for seven years.

21 MS. ADAMS: Would you like to make
22 that an Exhibit?

23 MR. WENDT: Sure.

24 MS. ADAMS: You have it already in.

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1 your file. We will be discussing it later.

2 MR. WENDT: Correct. It's in your
3 file now.

4 MS. ADAMS: Yes. If you want to
5 make it part of the record. Off the record.

6 (Off the record)

7
8 (A document was marked
9 as Exhibit A, by the
10 Court Reporter.)

11
12 MS. ADAMS: Back on the record.

13 Q. (By Ms. Adams, continuing:) Mrs. Uchniat, if we could
14 clarify a few things we had some questions.

15 It wasn't clear to all of us if
16 all the drums were emptied before they were buried.

17 Were all the drums emptied before
18 they were buried?

19 A. No.

20 Q. Why did some of them remain full when they were buried?

21 A. Because the fellows would drop them in the pit
22 accidentally.

23 Q. Did this happen often?

24 A. No.

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1 Q. As procedure, did you normally dump the drums?

2 A. No. The fellows that brought them in dumped them.

3 Q. So if somebody brought in drums, would they dump the
4 drums into the pits?

5 A. Yes.

6 Q. Would any of your employees dump the liquid in the
7 drums?

8 A. No.

9 Q. Would your employees tell them where to dump the
10 liquid?

11 A. Yes.

12 Q. Were the pits located around the Land Fill?

13 A. The pits were located mostly by the railroad track.

14 Q. And then where the emptied drums also buried by the
15 railroad tracks?

16 A. Yes.

17 Q. Were the empty drums buried anywhere else besides the
18 railroad tracks?

19 A. Not that I know of.

20 Q. Just that I understand, the drums were typically dumped
21 in pits which were located by --

22 They were emptied in pits.

23 Q. They were emptied into pits which were located by
24 railroad tracks?

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1 A. Yes.

2 Q. Thank you for correcting me.

3 And then when they were emptied
4 you would then bury them in the area near the railroad
5 tracks?

6 A. The drums?

7 Q. Correct.

8 A. No. We didn't bury the drums. The driver took them
9 back with him.

10 Q. Were empty drums ever buried on your site?

11 A. Never.

12 Q. If a drum is buried on your site, was this due to an
13 accidental dropping of it?

14 A. Yes.

15 Q. Would that drum very likely have waste in it?

16 A. Well, it depended on whether they got it out and
17 dropped it or whether they were dumping it and dropped
18 it.

19 Q. Okay. What were the dates when you were burning trash
20 at the site?

21 A. The dates?

22 Q. Yes, what years?

23 A. '56 when we started. And I don't know when we stopped.

24 I don't remember when we stopped burning.

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1 Q. Were you burning at the conclusion of your business?

2 A. No.

3 Q. Would you say you burned for ten years?

4 A. I couldn't say because I don't know.

5 Q. You mentioned earlier that you burned solid waste or
6 dry rubbish.

7 Did you ever burn any liquid
8 waste?

9 A. Never.

10 Q. Was liquid waste ever combined with the dry waste
11 accidentally or deliberately?

12 A. No.

13 Q. When Shelby Township residents would come to the G & H
14 Land Fill to dump something there, did they ever have a
15 green card with them?

16 A. No, they had a residential dumping card.

17 Q. Who gave them that dumping card?

18 A. Township.

19 Q. Did you know if Shelby Township gave the address of G &
20 H Land Fill?

21 A. Gave to it the residents?

22 As a city dump?

23 A. Yes.

24 Q. Would they represent your entity as a city dump?

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1 A. As a Land Fill.

2 Q. In the phone book do you recall if back in the 1950s,
3 late 1950s, did Shelby Township give the address of
4 3160, 23 Mile Road?

5 A. Repeat that?

6 Q. In the phone book back in the late 1950s, did the
7 Shelby Township give the address of 3160, 23 Mile Road?

8 A. I don't know.

9 MS. ADAMS: I am going to give the
10 Court Reporter an Exhibit to be marked.

11 (A document was marked
12 as Exhibit B, by the
13 Court Reporter.)
14

15 MS. ADAMS: I would like you and
16 Mr. Wendt to take a look at it. Mrs. Uchniat, this is
17 to help your recollection regarding some of the
18 questions we discussed earlier.

19 MR. WENDT: Is this Witness a
20 signatory to this instrument?

21 MS. ADAMS: Pardon me?

22 MR. WENDT: Is she a signatory
23 this instrument?

24 MS. ADAMS: Yes.

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1 THE WITNESS: He's dead.

2 MR. WENDT: Have you ever seen
3 this before?

4 THE WITNESS: That never went to
5 nothing.

6 MS. ADAMS: I just like to ask her
7 a couple questions. You can keep this in front of you
8 if you want.

9 Q. (By Ms. Adams, continuing:) Could you just tell me for
10 the record what Exhibit B is?

11 A. I don't know. That was between my husband and Schrot.

12 Q. Correct. What does it say on the document itself?

13 MR. WENDT: Well, it speaks for
14 itself, so you can just incorporate it as part of the
15 record. You want her to read it?

16 MS. ADAMS: Yes.

17 Q. (By Ms. Adams, continuing:) Do you recall Shelby
18 Improvement Inc. now that you have had an opportunity
19 to look at this sale of shares to Mr. Kervin and Mr.
20 Forester?

21 A. No. This is blocked. This is blocked. This is
22 something they drew up and never did anything with
23 Who blocked it?

24 A. My husband.

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1 Q. Do you know why he decided not go with Shelby
2 Improvement?

3 A. No, I don't know why, but he didn't.

4 Q. Do you now remember that there were some discussions
5 about Shelby Improvement Incorporated?

6 A. No, not until you brought that up.

7 Q. So Mr. Kervin never discussed with you Shelby
8 Improvement Inc.?

9 A. He never discussed his business with me never.

10 Q. Then how did you know it was blocked?

11 A. Because I know that never, none of that stuff in that
12 suitcase I had was worth two cents. It was all
13 blocked, he told me that.

14 Q. So Mr. Kervin told you that?

15 A. Yes. He put that stuff in that suitcase, he said this
16 is all junk.

17 MR. WENDT: Well, now we
18 identified this piece of junk as what now, Exhibit B,
19 okay.

20 Q. (By Ms. Adams, continuing:) Did you have any insurance
21 through G & H Land Fill?

22 Did I have any insurance on G & H Land Fill?

23 Correct?

24 A. Well, we had Workmen's Comp.

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1 Q. Did you have anything else besides Workmen's Comp?

2 A. Not that I can recall.

3 Q. Did you have any liability insurance?

4 A. No.

5 Q. Were you insured for the fire that took place to the
6 building in 1974?

7 A. Yes.

8 Q. Were you reimbursed?

9 A. Yes.

10 Q. Do you recall what insurance company that was?

11 A. No, I don't.

12 Q. Did you ever have any insurance company called Great
13 American Insurance Company?

14 A. Yes.

15 Q. Was that the insurance company?

16 A. I don't know if that was it or not.

17 MS. ADAMS: I am also going to
18 give something to the Court Reporter to mark as Exhibit
19 C. It's a Certificate of Co-partnership for ABCO
20 Rubbish Company with Harvey Kervin and Dorothy Kervin
21 to be co-partners.

22

23

24

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(A document was marked
as Exhibit C, by the
Court Reporter)

Q. (By Ms. Adams, continuing:) Do you recall being a
co-partner for ABCO Rubbish?

A. Never.

Q. You don't recall it?

A. Pardon?

Q. You do not recall it?

A. No. I was never a partner for ABCO Rubbish.

Q. Was this also a partnership that was blocked?

A. Yes.

Q. And why was it blocked?

A. I don't know.

Q. For Shelby Improvement Inc., were there ever shares
issued for Shelby Improvement Inc.?

A. That never went through, nothing.

MR. WENDT: The answer to that is
no?

THE WITNESS: No.

(By Ms. Adams, continuing:) I am just a little bit
confused in terms of what exactly is meant by blocked.

Was it something that eventually

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1 went out of business?

2 A. It was never in business.

3 Q. I think at this point I would like to try to move on
4 and determine people who may have had somebody bring
5 their waste on to the site.

6 In your 104 (e), which is Exhibit
7 A, you indicated that Acme Paint Company had brought
8 in liquid waste.

9 Do you recall that they brought in
10 liquid waste?

11 MR. WENDT: Are we on the Exhibit
12 A here?

13 MS. ADAMS: Yes.

14 MR. WENDT: Liquid waste Acme,
15 here.

16 Q. (By Ms. Adams, continuing:) Do you recall that Acme
17 Paint Company brought in liquid waste?

18 A. Yes.

19 Q. Do you recall who brought it there?

20 MR. WENDT: Physically brought it
21 there?

22 THE WITNESS: No.

23 (By Ms. Adams, continuing:) Do you know the type

24 waste that it was?

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1 A. Probably -- I don't know. I don't know.

2 Q. Was it the paint thinners or the paint that you
3 referred to earlier?

4 A. Could have been either one, could have been both.

5 Q. Do you recall the -- if there was an odor or color to
6 it?

7 A. No.

8 Q. Do you recall if it was Acme Paint Company or Acme
9 Quality Paints?

10 A. I don't know.

11 Q. Did you have any business dealings with R. H. Shaw
12 Company?

13 A. Not that I remember.

14 Q. Did you have any transactions with the Sherman Williams
15 Company?

16 A. No.

17 Q. Do you recall if they brought them in a 55 gallon drum
18 or if it was small 5 gallon types of drums?

19 A. Fifty-five gallon drums.

20 MR. WENDT: We are now talking
21 about Acme Paint?

22 MS. ADAMS: Acme, correct.

23 THE WITNESS: Yes.

24 Q. (By Ms. Adams, continuing:) In your 104 (e) you

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1 describe the waste coming in from Acme Paint as
2 sludges.

3 What do you remember when you saw
4 it that description, do you recall?

5 A. I don't know. We called a lot of stuff that come in
6 there sludge. We didn't know what it was to name it,
7 we just called it sludge.

8 Q. So sludge didn't stand for any particular type, it was
9 a generic term?

10 A. It was just a generic term.

11 Q. Do you know how long Acme Paint brought waste to the
12 site?

13 A. No, I don't.

14 Q. Did you have transactions with them over the entire
15 course of the G & H Land Fill operations?

16 A. No.

17 Q. Was it only in the beginning?

18 A. The beginning.

19 Q. And this is just an approximation, for approximately
20 five years?

21 A. I couldn't tell you, I don't know.

22 Q. So it could have been anywhere from zero to the time
23 years?

24 A. I don't know.

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1 Q. Did you have any transactions with the American
2 Asbestos Company? They are not listed in the 104 (e).

3 MR. WENDT: That is not contained.

4 MS. ADAMS: It is, I am sorry
5 is contained.

6 THE WITNESS: Yes.

7 Q. (By Ms. Adams, continuing:) Do you recall any
8 transactions with American Asbestos Company?

9 A. I don't recall.

10 Q. Do you recall the type of waste that they brought in?

11 A. No, I don't.

12 Q. Do you know how many years you had a relationship with
13 them?

14 A. No, I don't.

15 Q. Do you know who transported their waste for them, if
16 anyone?

17 A. No.

18 Q. Did you have any business transactions with Aristo
19 Corporation?

20 A. Aristo?

21 Q. Yes. They may or may not be on there. I don't think
22 they are.

23 A. No.

24 Q. Do you recall any Trans Delta Resin and Refractors?

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1 A. No.

2 Q. Did you have any business transactions with G & W
3 Trucking or G & W Cartage?

4 A. No. This is hard for me to remember all this stuff
5 here.

6 Q. That's okay, we understand that. Let me rephrase the
7 question.

8 Do you recall a G & W. Cartage
9 Company or G & W Trucking Company?

10 A. No, I don't.

11 Q. Do you recall anybody by the name of Amo Daniel
12 Winecki?

13 A. Danny Winecki, yes.

14 Q. Did he own G & W Trucking?

15 A. I don't remember.

16 Q. Did you ever have an agreement with Danny Winecki that
17 he would bring all of his waste to your facility?

18 A. Say that again?

19 Q. Do you recall if you had an agreement with Mr. Winecki
20 that he would bring all of his waste to the G & H
21 facility?

22 I don't recall.

23 MR. WENDT: Is that's spelled
24 here, Winecki?

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1 MS. ADAMS: No, it's -- and I
2 could be mispronouncing it.

3 MR. WENDT: Daniel Winecki,
4 waste.

5 Q. (By Ms. Adams, continuing:) Do you recall an
6 agreement, having an agreement?

7 A. I didn't even know there was one. I don't remember
8 there being one.

9 Q. You mentioned that he brought in liquid waste?

10 A. Yes.

11 Q. Would those liquid waste have gone into the pits?

12 A. No. His liquid waste was -- we dug a special pit for
13 him.

14 Q. Why did you do that?

15 A. Because it didn't amount to anything at all. I mean we
16 didn't put it with the pit and other sludges.

17 Q. Why didn't you want to mix it with the sludges?

18 A. Because it was such a small amount it would just seep
19 away.

20 Q. Do you recall if this material that Danny was bringing
21 was flammable?

22 A. No, it wasn't.

23 Q. Where was this special pit located on the facility?

24 A. We just put that any place. I mean you could even put

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1 it in the dry rubbish, as far as that goes.

2 Q. Do you recall having any transactions with C & C
3 Construction, I believe you did name them?

4 A. Yes. I don't remember the transactions with them, however.

5 Q. Do you recall having business dealings with them?

6 A. No, I don't. I guess we did because it's here.

7 Q. Because --

8 A. I forgot a lot of this, that's what I am trying to tell
9 you. I don't remember this stuff.

10 Q. That's okay, we understand that. And you did that
11 about seven years ago, so that's understandable.

12 When you listed people as bringing
13 in solid waste, would these be dumped in the dry pit
14 areas?

15 A. Solid waste, yes.

16 Q. Was liquid waste usually dumped in the pits with the
17 exception of Mr. Winecki's waste?

18 A. Yes.

19 Q. Was anybody else given special pits for the other
20 waste?

21 A. No.

22 Q. Do you recall having any business transactions with
23 Canada Dry?

24 A. Yes.

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- 1 Q. Do you recall what waste they brought on site?
- 2 A. Yes.
- 3 Q. Could you tell me what those waste were?
- 4 A. Pop with that sugar that went bad.
- 5 Q. The cyclamates?
- 6 A. Yes.
- 7 Q. Did they bring anything else to the site?
- 8 A. No.
- 9 Q. Do you recall having any relationship with Borman
- 10 Foods?
- 11 A. Yes.
- 12 Q. Do you recall what kind of trash they brought?
- 13 A. No, I don't remember what they brought.
- 14 Q. Do you recall if it was primarily food?
- 15 A. I don't remember.
- 16 Q. Would it have been liquid waste?
- 17 A. No.
- 18 Q. So it would have been dry rubbish also?
- 19 A. Yes.
- 20 Q. Do you recall who hauled for Borman?
- 21 A. No, I don't.
- 22 Q. Do you recall having business transactions with C
- 23 Fleming Landscaping?
- 24 A. Yes.

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- 1 Q. Do you recall what they brought?
- 2 A. Yes.
- 3 Q. What is it that they brought, what type of waste?
- 4 A. Brush, limbs, grass.
- 5 Q. Did they bring any fertilizers?
- 6 A. Not that I know of.
- 7 Q. Did they bring any liquids of any type?
- 8 A. No.
- 9 Q. Do you recall Central Qualify Services Corporation? I
- 10 don't believe they are on the list.
- 11 A. No, I don't remember them.
- 12 Q. Did you ever accept any chemical solvents as part of
- 13 the liquid waste?
- 14 A. No. If I knew it, no.
- 15 Q. Did you have any way of checking whether or not it
- 16 was a chemical solvent?
- 17 A. No, unless they told me.
- 18 Q. Did anyone ever mislead you into thinking a waste was
- 19 of a certain type when in fact you later discovered it
- 20 was something else?
- 21 A. No.
- 22 Q. Do you recall having any transactions with Chatham?
- 23 Complete Food Centers?
- 24 A. Chatham?

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1 Q. Chatham, I am sorry. Do you remember what type of
2 waste?

3 A. Yes. Their stores would burn up and they would bring
4 us their rubbish foods and stuff that was destroyed in
5 the fire.

6 Q. It was just a one-time transaction?

7 A. Well, a couple two or three times maybe.

8 Q. I am sorry, I probably misunderstand.

9 Would Chatham burn rubbish on
10 their own and bring it to you?

11 A. No. They had grocery stores, Chatham Grocery Stores,
12 and one of them would catch on fire and we could get
13 that stuff off them.

14 Q. Do you recall having any business transactions with
15 Chirco Homes?

16 A. Yes.

17 Q. Do you recall what they brought you?

18 A. Pieces of lumber from building their homes in Shelby.

19 Q. Did they ever bring you anything that was liquid?

20 A. No.

21 Q. Was everything, just wood, bricks, things of that
22 nature?

23 A. Yes, ma'am.

24 Q. Dry construction?

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1 A. Yes.

2 Q. Do you recall who their transporter was?

3 A. No.

4 Q. Do you remember Ray Malow?

5 A. No, I don't.

6 Q. M-a-l-o-w?

7 A. Ray Malow.

8 Q. I am mispronouncing his name, excuse me.

9 What relationship did you have
10 with him?

11 A. He's another builder.

12 Q. Did he bring waste to your site?

13 A. Wood.

14 Q. Did he bring any other type of waste?

15 A. No.

16 Q. You mentioned that typically you did receive or you
17 recall receiving the paints and the paint thinners.

18 Do you remember who was
19 responsible for sending you that paint and paint
20 thinners?

21 A. Who is responsible?

22 A. Yes. Who sent it to you?

23 A. Well, I really couldn't tell you exactly who brought
24 what.

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1 Q. I was just wondering since you remembered paints and
2 paint thinners if you remember by chance anybody that
3 was responsible for paint and paint thinners?

4 A. No.

5 MR. WENDT: You mean besides Acme?

6 MS. ADAMS: She did indicate

7 sludge.

8 MR. WENDT: Well, oh, I see. She
9 did say that liquid waste was produced by Acme sent to
10 her place. She did say they delivered sludges by
11 truck. Whatever that means, I don't know.

12 MS. ADAMS: I understand that's
13 what she said.

14 Q. (By Ms. Adams, continuing:) Do you recall anybody who
15 transported paints or paint thinners?

16 A. No. I don't know what they had in those barrels.

17 Q. Do you recall if they ever had any oil in them?

18 A. Yes, I heard them say, you know.

19 Q. Okay. That's what I am interested in.

20 Do you recall what companies were
21 giving you these oils?

22 Well, I can tell you the ones that brought the liquid
23 waste in.

24 Q. Aside from the 104 (e), the people that you listed in

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1 104 (e)?

2 A. You mean here?

3 Q. Right.

4 A. Yes, this is the ones.

5 Q. Do you recall any transactions with Chrysler
6 Corporation?

7 A. Chrysler, off the top of my head a little bit, yes.

8 Q. Do you remember dealing with them?

9 A. Yes.

10 Q. Do you know if they sent you liquid waste? Don't feel
11 free to limit yourself to the 104 (e). If you remember
12 something else, that's really why we are meeting with
13 you is trying to see if we can jog a memory from twenty
14 years ago, which granted is a long time ago. So don't
15 feel obligated to stay with that.

16 If you recall dealing with the
17 Chrysler Corporation, do you recall what type of waste
18 they brought there?

19 A. No, I don't.

20 Q. Do you recall if it was liquid waste?

21 A. I don't recall.

22 Q. Do you know who transported their waste for them?

23 A. No, I don't.

24 Q. Did they bring it themselves, do you know?

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1 A. I don't know.

2 Q. Did they bring it in drums?

3 A. I don't know that either.

4 Q. Do you recall having any business transactions with
5 Classic Homes?

6 A. Classic Homes?

7 Q. Correct.

8 A. Yes.

9 Q. Do you know what type of waste they brought in?

10 A. Wood. They build homes.

11 Q. Did they ever bring in any liquid waste?

12 A. Never.

13 Q. Do you recall any transactions with Detroit Edison?

14 A. No, I don't.

15 Q. Do you recall any transactions with DOW Chemical
16 Company?

17 A. Delco?

18 Q. DOW?

19 A. No.

20 Q. Do you recall any transactions with Deraco (sp) Paint
21 and Color Corporation?

22 A. No, I don't.

23 Q. Would they have sent you any paints or paint things?

24 A. Not that I know of. I don't even remember doing

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1 business with them.

2 Q. Do you recall any business transactions with Endless

3 Mold?

4 A. Yes.

5 Q. Do you recall what it is that they sent to you?

6 A. Scraps of wood and little pieces of metal and maybe a
7 tile, little tile.

8 Q. Did they send you anything in liquid form?

9 A. Never.

10 Q. Do you recall having any business transactions with
11 Fern Hill Village Apartments?

12 A. Yes, I do, yes.

13 Q. Do you recall what type of waste it was?

14 A. Yes, from building supplies, building wood and scraps.

15 Q. Was it any residential rubbish?

16 A. No.

17 Q. Any liquids?

18 A. No.

19 Q. Do you recall having any business transactions with
20 Florian Cleaners?

21 A. No, I don't.

22 Q. Did you ever accept any chlorinated solvents?

23 A. No, I don't.

24 Q. Do you recall having any business transactions with

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1 Ford Motor Company?

2 A. Yes.

3 Q. Do you recall what type of waste they brought?

4 A. We called it sludge.

5 Q. Can you tell me what it looked like, do you recall what
6 it looked like?

7 A. Kind of orange.

8 Q. Was there an odor about it?

9 A. No -- yes, it was sludge or cleaning oils. I don't
10 know really what it was. No odor.

11 Q. No odor?

12 A. No.

13 Q. Any other colors other than this orange color?

14 A. No.

15 Q. Did they bring it in drums?

16 A. No.

17 Q. It was uncontainerized, uncontained? Excuse me.

18 A. No, it was contained in railroad cars.

19 Q. So when it would come in on the railroad cars, did you
20 just open the railroad cars and it would be dumped?

21 A. We had a special pit for it.

22 Q. Did you have this type of arrangement with Chrysler
23 Corporation?

24 A. See, that I don't remember. I do not remember that.

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1 Q. Do you recall having that type of relationship with
2 anybody else besides Ford Motor Company?

3 A. Thompson Products.

4 Q. Do you recall their type of waste?

5 A. Similar to what Ford were bringing.

6 Q. Would you put the Thompson Products and the Ford-type
7 of waste in the same type of a pit?

8 A. Yes.

9 Q. What was the color of the ones from Thompson?

10 A. I don't know.

11 Q. Was there an odor to it, do you recall?

12 A. No. I think that was cleaning oils.

13 Q. Okay. Was it the railroad only that transported in
14 this type of waste for Ford Motor Company?

15 A. Yes.

16 Q. Did Ford Motor Company have anybody else that
17 transported waste for them?

18 A. No.

19 Q. Did Thompson Products have anybody else transport waste
20 out?

21 A. No.

22 Q. Who would open up the railroad cars so it would dump
23 out?

24 A. Whoever heard the railroad, my son or Bill or one of

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1 the employees.

2 Q. One of the employees would?

3 A. Yes.

4 Q. An employee of Ford Motor Company would not have
5 opened --

6 A. No.

7 Q. Do you recall having any business transactions with
8 General Motors Corporation?

9 A. Yes.

10 Q. Did you have the same type of arrangement with them
11 that you had with Ford Motor Company?

12 A. No.

13 Q. What type of waste did General Motors have?

14 A. General Motors brought me stuff from their display.
15 Like they display their cars or whatever they had and
16 anything they teared down they brought out; carpeting,
17 and wood, all kinds of stuff like that.

18 Q. Did they ever bring you any liquid wastes?

19 A. Not that I recall.

20 Q. Do you recall what they used as their transporter?

21 A. No, I don't.

22 Q. Do you recall any business transactions with Great
23 Scott?

24 A. Great Scott, I don't remember.

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1 Q. Do you recall any business transactions with J. B Tool
2 and Engineering?

3 A. J. B. Tool and Engineering, no, I don't.

4 Q. Okay. Do you recall any business transactions with
5 Kirlin Company?

6 A. With who?

7 Q. Kirlin, K-i-r-l-i-n.

8 A. No, I don't.

9 Q. Okay. Do you recall any business transactions with LTV
10 Corporation?

11 A. Yes. LTV?

12 Q. Yes.

13 A. LTV, no, I don't.

14 Q. Do you recall any waste on your site that resulted in
15 several intelligence investigators coming out to your
16 site?

17 MR. WENDT: Let's give a time
18 frame.

19 MS. ADAMS: I am not exactly sure
20 what the time frame would have been.

21 THE WITNESS: I don't know. It's
22 pretty hard for me to remember this stuff.

23 (By Ms. Adams, continuing:) Do you recall any type of
24 an uproar regarding some type of waste that you had

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1 accepted due to its sensitive material? Do you recall
2 any type of an incident involving that?

3 A. No.

4 Q. Do you recall any transactions with L. Loyer
5 Construction Company?

6 A. Yeah, it's here, but I can't remember what they brought
7 in.

8 Q. Okay, that's all right.

9 Do you recall any type of
10 transactions with Magnus Company?

11 A. No.

12 Q. Do you recall any transactions with the State of
13 Michigan?

14 MR. WENDT: You are talking about
15 dumping now?

16 MS. ADAMS: Correct.

17 MR. WENDT: Not the license issue
18 but just the dumping.

19 MS. ADAMS: That's correct.

20 THE WITNESS: No.

21 Q. (By Ms. Adams, continuing:) Do you recall any
22 transactions involving Michigan Chrome and Chemical
23 Company?

24 A. No, I don't.

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- 1 Q. Do you recall any type of business relationship with
2 Monroe Paper Company?
3 A. No.
4 Q. Do you recall any business relationship with River
5 Resin Paper Company?
6 A. No, I don't.
7 Q. Do you recall any relationship with Summerfelt Monroe
8 Paper Company?
9 A. No.
10 Q. Do you recall any relationship with National Machine
11 Products?
12 A. No, I don't.
13 Q. Do you recall any business relationship with Oakland
14 County residents?
15 A. Yes.
16 Q. Do you recall the type of waste they brought in?
17 A. Home rubbish.
18 Q. Did they bring in anything else?
19 A. No.
20 Q. Did they bring any liquid?
21 A. No.
22 Q. Do you recall any business relationship with PPG
23 Industries?
24 A. No, I don't.

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- 1 Q. Do you recall having any type of a business
2 relationship with Ditzler Paint Company?
3 A. Ditzler?
4 Q. Yes.
5 A. No, I don't.
6 Q. Did you receive any paints or paint thinners from
7 Ditzler Paint Company?
8 A. Not that I recall.
9 Q. Did you have any business relationship with Parke
10 Davis?
11 A. Not that I remember.
12 Q. Did you have any business relationship with Plastic
13 Trends Incorporated?
14 A. No, not that I know of.
15 Q. Do you recall any business relationship -- I may be
16 mispronouncing, Randazzo Fruit Company?
17 A. Yes, I remember them.
18 Q. What type of waste did they bring?
19 A. Vegetables.
20 Q. Did they bring anything else?
21 A. No.
22 Q. Do you recall any business relationship or business
23 transactions with Royal Oak Boring?
24 A. Royal Oak Boring, no -- well, no, I don't really

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1 remember them.

2 Q. Okay. Do you recall any business transactions with
3 Rechill (sp) Chemical Company?

4 A. Rechill, yes.

5 Q. Do you recall the type of waste that they sent you?

6 A. I don't remember what they sent me.

7 Q. Did they send you liquid waste?

8 A. I don't recall what they sent me. I do remember the
9 name.

10 Q. Do you remember the name James Bredloff (sp)?

11 A. No.

12 Q. Do you know who the transporter was for Rechill
13 Chemical Company was?

14 A. No, I don't.

15 Q. Do you recall any business transactions with
16 Rinshid-Mason? (sp)

17 A. No.

18 Q. Do you recall any business relationship with Shimerhorn
19 Paint Products?

20 A. No, I don't.

21 Q. Do you recall any business relationship with
22 Shatterproof Glass Corporation?

23 A. Yes, I do.

24 Q. Do you recall what type of waste they brought?

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- 1 A. I think broken glass.
- 2 Q. Is that all they brought?
- 3 A. As far as I can remember.
- 4 Q. Did they bring you anything that was a product from
- 5 their manufacturing process that took place?
- 6 A. I don't know.
- 7 Q. Did they ever bring you any liquid waste?
- 8 A. Not that I remember.
- 9 Q. Do you know who their transporter was?
- 10 A. No.
- 11 Q. What type of waste did Shelby Township residents
- 12 typically bring on the site?
- 13 A. Home rubbish.
- 14 Q. Did they ever bring any other type of trash?
- 15 A. No.
- 16 Q. When Shelby Township would let Shelby Township
- 17 residents go out there, who were these residents?
- 18 A. People in Shelby Township.
- 19 Q. Okay. Were any of them corporations?
- 20 A. No.
- 21 Q. Were any of them companies?
- 22 A. No.
- 23 Q. Was it strictly residential?
- 24 A. Residential.

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1 Q. Do you recall any of business transactions with
2 Standard Press Steel?

3 A. No, I don't.

4 Q. Do you recall any business transactions with Minnesota
5 Mining and Manufacturing, otherwise known as 3M?

6 A. I remember Minnesota Mining and Manufacturing. I have
7 no idea what they brought in there.

8 Q. You don't know whether it was liquid or solid?

9 A. No.

10 Q. Do you recall who brought waste for Thompson Products?

11 A. I don't know who brought it in, no.

12 Q. Do you recall accepting any or having any business
13 transactions with the City of Utica?

14 A. Yes.

15 Q. Do you know what type of waste they brought in?

16 A. Home rubbish.

17 Q. Any other type of waste?

18 A. No.

19 Q. Any liquid waste?

20 A. No.

21 Q. Do you recall any business transactions with the United
22 States Chemical Company?

23 A. Yes.

24 Q. Do you recall what type of waste they brought?

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1 A. No, I don't.

2 Q. Did they bring other people's waste?

3 A. No.

4 Q. Did they bring their own waste?

5 A. As far as I know.

6 Q. And do you recall if it was liquid?

7 A. I don't know. I just remember the name.

8 Q. Okay. That's fine.

9 Do you know what type of a
10 business United States Chemical Company was?

11 A. No.

12 Q. Do you recall any business transactions with United
13 States Rubber Company?

14 A. Yes.

15 Q. Do you recall what type of waste that they brought?

16 A. Tires.

17 Q. Do you recall any other items that they brought on to
18 the site?

19 A. No.

20 Q. Did they bring anything called carbon black on to the
21 site?

22 A. I don't remember.

23 Q. Do you know who transported their waste for them?

24 A. No.

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1 Q. Did they bring waste on the railroad?

2 A. Yes.

3 Q. Did they have any of the same procedures that we
4 discussed with Ford Motor Company?

5 A. No. We had a truck that went down and unloaded them.

6 Q. Your own truck?

7 A. Yes.

8 Q. Would one of your employees unload the railroad car.

9 A. Yes.

10 Q. Where were these buried?

11 A. They were buried close to 23 Mile Road.

12 Q. Were they buried along with other dry trash or did you
13 have a specific area for the tires?

14 A. We had a specific area for the tires.

15 Q. And I am sorry, what was that area again?

16 A. Along 23 Mile Road.

17 Q. Thank you.

18 Was this carbon black contained?

19 A. I don't remember the carbon black.

20 Q. Were the tires contained?

21 A. What do you mean "contained?"

22 ~~x~~ A. Well, were they in something or were they just loose
23 tires?

24 A. They were loose tires in a railroad car.

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1 Q. Were these threaded tires or in the original form?

2 A. Original form, but they were cut.

3 Q. Like in half?

4 A. No, like that, so they couldn't be used again.

5 Q. Almost as though the gesture that you made was like
6 slashing.

7 THE WITNESS: Yes.

8 MR. WENDT: Like city mutilation.

9 Q. (By Ms. Adams, continuing:) Did anybody else transport
10 for the United States Rubber Company besides the
11 railroad?

12 A. No.

13 Q. Do you recall any business transactions with Utica
14 Packing Company?

15 A. Yes.

16 Q. Do you recall what type of waste they brought?

17 A. Yes.

18 Q. What type of waste?

19 A. Pig.

20 Q. P-i-g?

21 A. Pig guts.

22 Q. Did they bring anything else?

23 A. No.

24 Q. Do you recall any business transactions with Utility

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1 Enameling Company?

2 A. No, no, I don't.

3 Q. Have you ever heard of Utility Enameling Company?

4 A. I don't recall.

5 Q. Do you recall any business transactions with Vicker
6 (sp) Hydraulic Pump Company?

7 A. No, I don't.

8 Q. Do you recall any business transactions with Worford
9 Drum Company?

10 A. No.

11 Q. Are you all right, or are you tired? Would you like to
12 take a break?

13 A. I am fine.

14 MR. WENDT: I see you still got --

15 MS. ADAMS: Well, just a few then
16 I have a list of transporters I also like to run
17 through.

18 MR. WENDT: We better break for
19 lunch. I don't want to break an hour for lunch, but
20 maybe a half hour or something like that would be in
21 order.

22 MS. ADAMS: You want me to just
23 finish, I have three.

24 MS. ADAMS: Is that all right with

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1 you, Mrs. Uchniat?

2 THE WITNESS: Yes.

3 Q. (By Ms. Adams, continuing:) Do you recall receiving
4 any -- or having any business transactions with the
5 City of Warren?

6 A. Yes.

7 Q. Do you recall what they brought in?

8 A. They brought stuff from the incinerator.

9 Q. I am sorry?

10 A. Stuff from their incinerator.

11 Q. What type of an incinerator was it, do you know?

12 A. I don't know. It was all ashes, all burned.

13 Q. What did you do with these ashes?

14 A. Put it out in the dump.

15 Q. Was there any specific place for them?

16 A. No.

17 Q. Were these ashes in a container of some type?

18 A. No, truck.

19 Q. So a dump truck would come in and just dump it there?

20 A. Yes.

21 Q. Do you know how long your relationship was with the
22 City of Warren?

23 A. Maybe I got three loads from them, if I got that

24 Q. Do you recall how long your relationship and

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1 arrangements were with Ford Motor Company?

2 A. 1958 to 1968.

3 Q. So it was for ten years?

4 A. Yes.

5 Q. Do you know how long the relationship existed with
6 Thompson Products?

7 A. Oh, Thompson Products we got -- I don't know. I don't
8 know, wasn't very long.

9 Q. Was it as long as Ford Motor Company?

10 A. No. 1958 to '68.

11 MR. WENDT: That's what you said
12 on the Sworn Statement.

13 THE WITNESS: Maybe, I don't know.
14 I don't remember. I am telling you I don't remember.

15 MS. ADAMS: That's okay, we
16 understand that. Don't be bothered by that.

17 Q. (By Ms. Adams, continuing:) Do you recall any
18 transactions with Winkelman's?

19 A. Winkelman's, I don't remember the name.

20 Q. Do you recall if it was somebody who brought other
21 people's waste on to the site?

22 A. No.

23 You do not recall?

24 A. No, I don't recall.

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1 Q. Do you recall any of these relationships with Wyandott
2 or Wyandott Paint Company?

3 A. No, no, I don't.

4 Q. Do you recall any business relationships with AKZO?

5 A. No, I don't.

6 Q. I'm going to have to ask a general question along the
7 paints and paint thinners.

8 Did they commonly come in drums?

9 A. You mean the stuff that was dumped?

10 Q. The paints and paint thinners, correct?

11 A. Except for Ford Motor and Thompson.

12 Q. Everything came in drums of some type?

13 A. Yes.

14 Q. Specifically relating to Acme Quality, when they
15 brought in drums, did they dump these sludges into your
16 pits?

17 A. Yes.

18 MR. WENDT: Wait a minute. You
19 say Acme Quality. She defined back in 1983, Acme
20 Paints. Are they the same?

21 MS. ADAMS: Actually, no. That's
22 why I was asking the question earlier. They are
23 separate companies.

24 THE WITNESS: Well, Acme Quality I

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1 thought I cleared that up. I don't know anything about
2 them.

3 Q. (By Ms. Adams, continuing:) Well, it seemed to me that
4 you indicated earlier that you weren't sure with whom
5 you had dealt when I originally asked the question.

6 A. Acme Paint is who I dealt with.

7 Q. In any event, when they would bring in these paints and
8 paint thinners were these dumped into the pits?

9 A. As far as I know, yes.

10 Q. Did they take the empty drums then back with them?

11 A. Yes.

12 Q. Who would do the dumping?

13 A. I don't know.

14 Q. Would it be your employees?

15 A. No.

16 Q. Would it be the employee of Acme Paint Company?

17 A. Correct.

18 MS. ADAMS: All right. I am done
19 with the generators. You want to take a lunch break.

20

21

22

23

(Luncheon recess)

24

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1 Q. (By Ms. Adams, continuing:) Mrs. Uchniat, we were
2 almost done. We have just a little bit more to go.

3 I am now going to ask you some
4 questions about some of the transporters who may have
5 brought something to the site for other people, not
6 necessarily the waste they generated, be it waste they
7 picked up from other companies, some of which we
8 discussed earlier as generators.

9 I am going to be asking you much
10 of the same questions that we were asking earlier
11 regarding the generators, and I appreciate your
12 patience today.

13 Do you recall any dealings with
14 the A & F Trucking Company?

15 A. No, I don't.

16 Q. Do you recall any business transactions with the Astro
17 Oil Company?

18 A. No, I don't.

19 Q. A-s-t-r-o?

20 A. No, I don't.

21 Q. Do you recall any business transactions with Active
22 Disposal Company?

23 A. Active Disposal, yes.

24 Q. Do you recall who owned and operated the Active

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- 1 Disposal Company?
- 2 A. I did know.
- 3 Q. Take your time?
- 4 A. No, I don't remember who did.
- 5 Q. Do you recall any employees with whom you dealt with
- 6 with the Active Disposal Company, any drivers?
- 7 A. No, I don't.
- 8 Q. Do you recall the type of waste that Active Disposal
- 9 Company brought on to the site?
- 10 A. They picked it up from grocery stores, fruit markets,
- 11 offices. We call that dry waste.
- 12 Q. Did they ever bring in any liquid waste?
- 13 A. Yes, they did.
- 14 Q. Do you know from whom they got this liquid waste?
- 15 A. No, I don't.
- 16 Q. Do you know what kind of waste it was, I mean was it --
- 17 what kind of color it had?
- 18 A. No.
- 19 Q. Do you recall if it had any odor to it?
- 20 A. I don't know.
- 21 Q. Do you know how often Active Disposal use to come to
- 22 the G & H Land Fill?
- 23 A. No, I don't.
- 24 Q. Do you know how long you dealt with the Active Disposal

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- 1 Company?
- 2 A. No, I don't.
- 3 Q. Was it for the entire time of your operation or less
- 4 than that?
- 5 A. No, less.
- 6 Q. Do you know if they are still in business?
- 7 A. I don't know.
- 8 Q. Do you know if they were ever sold to anyone?
- 9 A. I think BFI. Richard Evenhouse is the fellow.
- 10 Q. Could you spell that?
- 11 A. E-v-e-n-h-o-u-s-e.
- 12 Q. Do you know where he's located?
- 13 A. He's the one that owned Active.
- 14 Q. He owned Active?
- 15 A. Yes. You asked me earlier and I didn't know.
- 16 Q. Do you know if he's still alive?
- 17 A. I don't know.
- 18 Q. Do you recall any transactions with Aides Industrial
- 19 Disposal?
- 20 A. Yes, I do.
- 21 Q. Okay. Do you recall who operated or owned the company?
- 22 A. No, I don't.
- 23 Q. Do you recall any employees with whom you dealt with
- 24 Aides Industrial?

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- 1 A. No.
- 2 Q. All right. Did you know for whom they transported
- 3 waste?
- 4 A. From like stores and different places around, but no
- 5 Stores, fruit markets, apartments.
- 6 Q. Were they limited to just residential trash?
- 7 A. Yes.
- 8 Q. And produce?
- 9 A. Yes.
- 10 Q. Do you know if they are still in operation?
- 11 A. I don't know.
- 12 Q. Do you recall any business transactions with Allen
- 13 Trucking Company?
- 14 A. No, I don't.
- 15 Q. Do you recall any business transactions with American
- 16 Tank Service Company?
- 17 A. No.
- 18 Q. Do you recall any business transactions with Bill's
- 19 Road Oiling?
- 20 A. Yes, I do.
- 21 Q. Do you recall what type of waste they brought in?
- 22 Yes, liquid.
- 23 Do you recall the color?
- 24 A. No, I don't.

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1 Q. Any odor?

2 A. Not that I know of.

3 Q. Do you recall if it was waste oil?

4 A. I believe it was.

5 Q. Do you know how often Bill's Road Oiling brought stuff
6 on to the G & H Land Fill?

7 A. Maybe once every two weeks.

8 Q. Do you know for how long?

9 A. No, I don't.

10 Q. Was it for the entire time of your operation or less
11 than that?

12 A. No, less.

13 Q. Less time.

14 Do you know who operated or owned
15 Bill's Road Oiling?

16 A. No, I don't.

17 Q. Did you know Bill Rubin?

18 A. No.

19 Q. Okay. Do you recall any employees with whom you worked
20 for Bill's Road Oiling?

21 A. No.

22 Q. Do you recall whether or not they are still in
23 business?

24 A. I don't know.

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- 1 Q. Do you know where they were located?
- 2 A. No.
- 3 Q. Do you recall any business transactions with American
4 Waste Oil Company?
- 5 A. Yes.
- 6 Q. Do you know who owned and operated American Waste?
- 7 A. No, I don't.
- 8 Q. Do you know for whom they hauled waste?
- 9 A. No, I don't.
- 10 Q. Do you recall if they hauled waste for General Motors?
- 11 A. I don't recall.
- 12 Q. Okay. Do you recall if they hauled waste for National
13 Machine Products?
- 14 A. I don't recall that either.
- 15 Q. Do you recall what type of waste American Oil Waste
16 brought on the site?
- 17 A. No, I don't.
- 18 Q. Do you recall if it was liquid waste?
- 19 A. I believe.
- 20 Q. Do you recall liquid waste of some type?
- 21 A. I don't recall.
- 22 Q. Do you recall if the color or if there was an odor?
- 23 A. No.
- 24 Q. Do you recall how often they use to bring waste on to

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1 the sita?

2 A. No, I don't.

3 Q. Do you know if they are still in business?

4 A. I don't know that either.

5 Q. Do you recall where they were located?

6 A. No.

7 Q. Even a town?

8 A. No.

9 Q. Do you recall, and again I am probably mispronouncing,
10 Anchille -

11 A. Anchille Trucking Company.

12 Q. Do you recall who owned and operated it?

13 A. Charles Anchille. He's dead.

14 Q. Thank you.

15 Did Charles Anchille, Junior, ever
16 operate Anchille Trucking Company?

17 A. I never knew him.

18 Q. Okay. Did you know Harin Anchille?

19 A. No.

20 Q. Are you familiar with Anchille Refuse Company?

21 A. I am familiar with it, yes.

22 Do you know if it was related to Anchille Trucking
23 Company?

24 A. Yes, it was.

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1 Q. Do you know if Anchille Trucking Company and/or
2 Anchille Refuse Company was sold to American Tank
3 Service Company?

4 A. No.

5 Q. Do you know if Anchille was associated with American
6 Tank Service Company?

7 A. I don't know that either.

8 Q. Was Anchille associateed -- I mean Anchille Trucking
9 Company associated with Bill's Road Oiling?

10 A. I don't know.

11 Q. Do you recall who Anchille Trucking hauled for?

12 A. Anchille?

13 Q. Yes.

14 A. They picked up their own. They had their own
15 contracts. I don't know who it was from though.

16 Q. You don't recall who they were transporting waste for?

17 A. No.

18 Q. Do you recall if Anchille Trucking brought in paints or
19 paint thinners?

20 A. Yes, they did. Brought in what we call sludge.

21 Q. Was sludge typically called paints or paint thinner?

22 A. Anything they brought in a barrel was sludge.

23 Q. Do you know if Anchille ever hauled for Wyandott
24 Chemical Company?

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- 1 A. No, I don't.
- 2 Q. Do you know if they hauled for DOW Company?
- 3 A. No, I don't.
- 4 Q. Do you know if they hauled for Parke Davis?
- 5 A. I don't know that either.
- 6 Q. Do you know if they hauled for Ditzler Paints?
- 7 A. I don't know if they did.
- 8 Q. Do you know if they hauled for Chrysler Corporation?
- 9 A. I don't know.
- 10 Q. Did they ever bring any waste that would have been
- 11 referred to as biological chemical warfare waste?
- 12 A. I don't know.
- 13 Q. Did they bring in drug manufacturing waste?
- 14 A. None.
- 15 Q. Did they bring in any lead and acid compounds?
- 16 A. I don't know.
- 17 Q. Do you know how often Anchille Trucking brought in
- 18 waste?
- 19 A. No, I don't.
- 20 Q. Did you have transactions with them throughout the life
- 21 of G & H Land Fill?
- 22 A. No, I don't because that was the first part.
- 23 Q. What happened to the business at that time after
- 24 stopped dealing with you?

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- 1 A. I don't know, took it someplace else.
- 2 Q. Did they go out of business, do you know?
- 3 A. No.
- 4 Q. Do you know if it's still in business?
- 5 A. I don't know.
- 6 Q. Do you know where they were located?
- 7 A. They were located on Mound Road. That would be Warren;
- 8 Warren, Michigan.
- 9 Q. All right. Some of these liquid wastes that Anchille
- 10 brought in, did they have a color?
- 11 A. No.
- 12 Q. Did they have an odor?
- 13 A. No.
- 14 Q. Did you have any business transactions with ML Asberry?
- 15 (sp)
- 16 A. I don't recall.
- 17 Q. Did you have any business relationships with Asberry
- 18 Trucking?
- 19 A. I don't recall.
- 20 Q. Do you recall any transactions with Avon Disposal?
- 21 A. Yes.
- 22 Q. Do you know who owned and operated Avon Disposal?
- 23 No, I don't.
- 24 Q. Do you recall where they were located?

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- 1 A. No.
- 2 Q. Are they still in business?
- 3 A. I don't know.
- 4 Q. Do you recall the type of waste that they brought?
- 5 A. Home rubbish.
- 6 Q. Did they bring anything else?
- 7 A. No.
- 8 Q. Did they bring any liquid waste?
- 9 A. Not that I remember, no.
- 10 Q. How long did Avon Disposal bring waste to your site, do
- 11 you remember?
- 12 A. I don't recall that either.
- 13 Q. Was it for the life of G & H Land Fill?
- 14 A. No.
- 15 Q. Do you recall any business transactions with B & B
- 16 Trucking?
- 17 A. B & B, yes.
- 18 Q. Do you recall who owned and operated B & B Trucking?
- 19 A. No, I don't.
- 20 Q. Do you recall any employees with whom you interacted at
- 21 B & B Trucking?
- 22 A. No.
- 23 Q. Do you recall the types of waste they brought?
- 24 A. Liquid.

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- 1 Q. Do you recall any of people for whom they were hauling?
- 2 A. No.
- 3 Q. Do you recall the color of the liquid waste they
- 4 brought in?
- 5 A. No.
- 6 Q. Do you recall if there was any odor?
- 7 A. No.
- 8 Q. Do you know how long they brought liquid waste to G &
- 9 H?
- 10 A. No, I don't.
- 11 Q. Was it less than the life of the Land Fill?
- 12 A. Yes.
- 13 Q. Do you recall Beers Disposal Service?
- 14 A. Yes.
- 15 Q. Do you recall who owned and operated Beers Disposal?
- 16 A. Al Schultz.
- 17 Q. I want to go back to B & B Trucking firm for a moment.
- 18 Do you recall where they were
- 19 located?
- 20 A. No, I don't.
- 21 Q. Do you know if they are still in business?
- 22 I don't know that.
- 23 Back to Beers Disposal Service, did you say Al Sch
- 24 owned and operated it?

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- 1 A. Yes, as far as I can remember.
- 2 Q. Do you know anybody named H. Schultz?
- 3 A. No.
- 4 Q. Do you recall any employees with whom you dealt?
- 5 A. No.
- 6 Q. Do you recall where they were located?
- 7 A. No, I don't.
- 8 Q. Do you know if they are still in business?
- 9 A. I don't know.
- 10 Q. Do you recall what type of waste they use to bring to
- 11 the site?
- 12 A. From homes, home rubbish.
- 13 Q. Did they ever bring any liquid waste?
- 14 A. Yes, they did.
- 15 Q. Do you recall from whom they got that liquid waste?
- 16 A. No, I don't.
- 17 Q. Do you recall what type of liquid waste it was?
- 18 A. No.
- 19 Q. Did it have a color?
- 20 A. No.
- 21 Q. Or an odor?
- 22 A. No.
- 23 Q. Do you know how often Mr. Schultz use to bring waste
- 24 into your facility?

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- 1 A. No, I don't.
- 2 Q. Did he bring it in for the life of your operation?
- 3 A. No, first part.
- 4 Q. Did you see Mr. Schultz on a regular basis? Did he
- 5 come in every week, every month?
- 6 A. He brought residential rubbish most every day, but the
- 7 liquid he didn't. Maybe he brought in a load a week.
- 8 Q. Pardon me?
- 9 A. Maybe he brought in one load a week.
- 10 Q. Did you have any business transactions with BFI or
- 11 otherwise known as Browning Ferris Industries?
- 12 A. I don't remember if we did have business with them or
- 13 not. That use to be active.
- 14 Q. Pardon me?
- 15 A. It use to be active.
- 16 Q. Do you know if Browning Ferris Industries purchased
- 17 Shelby Disposal Service?
- 18 A. I don't know.
- 19 Q. Do you know if they purchased Macomb Disposal?
- 20 A. I don't know that either.
- 21 Q. Do you know if they purchased Kramer Trucking?
- 22 A. I don't know that.
- 23 Q. Are you familiar with Shelby Disposal Service?
- 24 A. Yes.

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1 Q. Do you know who owned and operated it?

2 A. George Hideley.

3 Q. Do you recall any employees with whom you worked?

4 A. No, I don't.

5 Q. Do you recall the type of waste that Shelby Township
6 brought?

7 A. Home rubbish.

8 Q. Did they ever bring in any liquids?

9 A. Never.

10 Q. Do you know if Shelby Disposal ever sold to Gill
11 Kramer?

12 A. I don't know.

13 Q. Is Shelby Disposal still in operation?

14 A. No, not that I know of.

15 Q. Do you know where they were located?

16 A. On Shelby Road in Utica. I understand George is in
17 California now.

18 Q. Do you know for whom Shelby Disposal brought waste?

19 A. No. Homes around Shelby Township.

20 Q. Just residential residences?

21 A. Yes.

22 Q. How often did they come to your facility?

23 A. Once a day.

24 Q. Are you familiar with Macomb Disposal?

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- 1 A. Yes.
- 2 Q. Do you know who owned and operated Macomb Disposal?
- 3 A. No, I don't.
- 4 Q. Okay. Do you know the type of waste that they brought
- 5 in?
- 6 A. Residential.
- 7 Q. Any liquid waste?
- 8 A. No.
- 9 Q. Do you recall any employees to whom you had any contact
- 10 from Macomb Disposal?
- 11 A. No, I don't.
- 12 Q. Was Macomb Disposal ever sold to Gill Kramer?
- 13 A. I don't know.
- 14 Q. Do you know if Kramer Trucking was affiliated with
- 15 Shelby Disposal or Macomb Disposal?
- 16 A. I don't know. I don't know about that.
- 17 Q. Do you know if Gill Kramer was related to Oscar Kramer?
- 18 A. There was an Oscar Kramer who was in the paint
- 19 business, Kramer Paints or Waste or something like
- 20 that, but I don't know if they were affiliated or not.
- 21 Q. Did you ever accept waste from Kramer Trucking?
- 22 A. Yes.
- 23 Q. Do you recall the type of waste?
- 24 A. Liquid.

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1 Q. Do you recall who owned and operated Kramer Trucking?

2 A. I think his name was Harold Kramer.

3 Q. Harold Kramer.

4 Do you recall the type of liquid
5 waste that Harold Kramer brought in?

6 A. No, I don't.

7 Q. Do you recall how he transported this waste?

8 A. In barrels.

9 Q. Do you know whose waste it was that he brought in?

10 A. No, I don't.

11 Q. Did the waste have any particular color?

12 A. Not that I know of.

13 Q. Or an odor?

14 A. Not that I know of.

15 Q. Do you know if Browning Ferris Industries owns
16 Reitzloff Rubbish Removal?

17 A. Pardon?

18 Q. Do you know if Browning Ferris Industries owns
19 Reitzloff Rubbish?

20 A. I don't know.

21 Q. Do you know if Kramer Trucking also transported waste
22 to LDI?

23 A. I don't know that.

24 Q. If LDI was closed or otherwise unable to take any

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1 waste, did Kramer Trucking Company come to the G & H
2 facility?

3 A. Not that I know of.

4 Q. How often did Kramer Trucking bring waste down to the G
5 & H Land Fill?

6 A. As far as I can remember a couple times a week.

7 Q. For how long, for the life of the G & H Land Fill?

8 A. No.

9 Q. Less than?

10 A. Yes.

11 Q. Do you recall any transactions with BFI Oil Service
12 Company?

13 A. BFI?

14 Q. Yes.

15 A. No, I don't.

16 Q. Do you recall if Bill's Waste Oil was affiliated with
17 Bill's Road Oiling?

18 A. I don't know.

19 Q. Do you know if Bill's Waste Oil was also known as
20 American Truck Service Company?

21 A. I don't know that either.

22 Q. Did you have any transactions with Bud's Disposal
23 Service?

24 A. Yes.

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1 Q. Do you know who owned and operated Bud's Disposal
2 Service?

3 A. No, I don't.

4 Q. Do you recall any employees with whom you had contact?

5 A. No.

6 Q. Do you recall the type of waste they brought in?

7 A. Rubbish from homes.

8 Q. Any other type of waste?

9 A. No.

10 Q. Do you know for whom they got some of this rubbish?

11 A. No, I don't.

12 Q. Did they ever bring any waste from Vickers Hydraulic
13 Pump Company?

14 A. I don't know.

15 Q. Do you recall having any transactions with Burton
16 Brothers?

17 A. Yes.

18 Q. Were they also known as Burton Fire Repair Service?

19 A. Yes.

20 Q. Do you know who owned and operated Burton Brothers?

21 A. No, I don't.

22 Q. Do you recall any employees with whom you had any
23 contact?

24 A. No.

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1 Q. Do you know who they hauled waste for?

2 A. No, I don't.

3 Q. Do you recall the waste type that they brought in?

4 A. Yes, it was when a building would burn or something,
5 they would go out and repair it and bring us the waste
6 from the burn.

7 Q. What kind of waste would that be considered to be?

8 A. Boards, and little things, glass, whatever burnt.

9 Q. Would that be then dumped with the dry rubbish?

10 A. Yes.

11 Q. Did they ever bring in any liquid waste from these
12 fires?

13 A. No.

14 Q. Do you recall any transactions with Central Oil
15 Service?

16 A. Yeah, I remember the name.

17 Q. Do you recall who owned or operated it?

18 A. No, I don't.

19 Q. Did you know Marvin O'Kray?

20 A. No.

21 Q. Was Central Oil Service involved in oil recovery?

22 A. I don't know.

23 Q. Did they haul any waste oil?

24 A. Yes, they did.

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1 Q. Do you know for whom they were hauling this oil?

2 A. No, I don't.

3 Q. Were they also known as Al Waste Oil Pickup?

4 A. I don't know that either.

5 Q. Did they bring any other type of waste other than this
6 waste oil?

7 A. No.

8 Q. Do you recall any color to the waste oil?

9 A. No.

10 Q. Any odor?

11 A. No.

12 Q. Do you recall how often Central Oil Service brought
13 waste?

14 A. No, I don't.

15 Q. Do you know if they are still in business?

16 A. No, I don't know that.

17 Q. Do you know where they were located?

18 A. No.

19 Q. Do you recall any business transactions with Commercial
20 Removal?

21 A. Commercial, yes.

22 Q. Do you know who owned and operated Commercial?

23 A. No, I don't.

24 Q. Do you recall any employees with whom you had contact?

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- 1 A. No.
- 2 Q. Do you recall the waste type that they brought on to
3 the site?
- 4 A. No, I don't.
- 5 Q. Do you recall if it was liquid?
- 6 A. I don't think it was liquid, but I am not sure.
- 7 Q. Okay. Do you know for whom they were hauling waste?
- 8 A. No, I don't.
- 9 Q. Do you recall where they were located?
- 10 A. No.
- 11 Q. Do you know if they are still in business?
- 12 A. I don't know.
- 13 Q. Do you know if they were ever purchased by Laidlaw
14 Transportation?
- 15 A. I don't know.
- 16 Q. Did Laidlaw Transportation ever bring waste to the
17 facility?
- 18 A. I don't know.
- 19 Q. Do you know if Commercial Removal was associated with
20 Bell Pickup?
- 21 A. I don't know.
- 22 Q. Did Bell Pickup ever bring waste to your facility?
- 23 A. Not that I know of, no.
- 24 Q. Do you know if Commercial Removal was ever known as

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1 GSX?

2 A. I don't know.

3 Q. Did you have any business transactions with GSX?

4 A. No.

5 Q. Do you know how often Commerical Removal brought waste
6 to your facility?

7 A. No. I don't remember.

8 Q. Did they come once a week, once a month?

9 A. I don't know.

10 Q. Did they bring stuff for the life of the G & H Land
11 Fill operation?

12 A. No.

13 Q. Less than that?

14 A. Pardon?

15 Q. Was it less than that?

16 A. I imagine.

17 Q. Did you have an agreement with the railroad company?

18 A. What do you mean agreement?

19 Q. Let me put it another way.

20 Does the railroad run through the
21 G & H Land Fill? Are there railroad tracks that run
22 through?

23 A. Yes, G & H is on this side and this side, yes.

24 Q. So did it run on the border of the G & H Land Fill or n

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1 the border --

2 A. The border.

3 Q. What railroads operated on those?

4 A. New York Central.

5 Q. Was it New York Central that brought in waste that came
6 in by railroad?

7 A. Yes. Now, Ford Motor Company had their own engine that
8 brought their stuff in. New York didn't bring it in.

9 Q. Thank you.

10 I think I asked you earlier
11 whether or not New York Central is associated with Penn
12 Central?

13 A. I don't know.

14 Q. And do you know if it's associated with Con Rail?

15 A. I don't know that either.

16 Q. Do you know who New York Central did haul for?

17 A. No.

18 Q. Did they ever haul for Monroe Paper Company?

19 A. Not that I remember.

20 Q. Okay. Did they ever haul for United States Rubber?

21 A. I don't remember.

22 Q. Okay. We discussed a company earlier that I would like
23 to go back a little bit.

24 Did you ever have any business

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1 transactions with D & D Rubbish Service?

2 A. Yes.

3 Q. And I am sorry. Could you refresh my memory. Who
4 owned D & D Rubbish?

5 A. Don Nider.

6 Q. Did Shelby Disposal have an affiliation with D & D
7 Rubbish?

8 A. Brother-in-laws.

9 Q. He was the brother. Don Nider was the brother-in-law
10 of George.

11 A. Hidely.

12 Q. Do you know who D & D Rubbish Service hauled for?

13 A. No, I don't.

14 Q. Did they bring in liquid waste?

15 A. No.

16 Q. Did they bring in solid waste?

17 A. Yes.

18 Q. Did they ever bring in liquid waste?

19 A. No.

20 Q. Were you in any way affiliated with D & D Rubbish
21 Service?

22 A. No.

23 Q. Do you know if D & D Rubbish Service was sold to BFI?

24 A. I don't know. No, my son had D & D, he bought that.

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1 Q. Now, after Gary was done operating D & D Rubbish
2 Service, had he sold it to BFI?

3 A. No, he didn't sell it to BFI. He sold one of his
4 trucks to some rubbish company out in Oxford, I think
5 but that was the end of it. He didn't sell the
6 business, he just quit.

7 Q. He just dissolved the business?

8 A. Yes.

9 Q. When did Gary purchase D & D Rubbish?

10 A. I don't know.

11 Q. Was it after 1974?

12 A. Yes.

13 Q. Okay. Did Mr. Nider bring waste to your facility
14 during the time he operated D & D Rubbish?

15 A. Yes.

16 Q. Do you recall any transactions with Dearborn Refining
17 Company?

18 A. No, I don't.

19 Q. I just want to go back to D & D Rubbish Service. Do
20 you recall where they were located?

21 A. On Pappy Lane in Dica. You are talking about Don
22 Nider now?

23 Q. Correct.

24 A. Yes.

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1 Q. When your son took it over, did he change the location
2 of D & D Rubbish Service?

3 A. Well, he lived -- his location was where I am living
4 now.

5 Q. Okay. Did you know Jerry Ashtenau? Maybe I am
6 mispronouncing it.

7 A. No.

8 Q. Do you recall any transactions that you had with G & W
9 Trucking or G & W Cartage Company?

10 A. G & W Trucking Company, I recall the name.

11 Q. Was it owned and operated by any of the Winecki
12 brothers?

13 A. Yes.

14 Q. Could you tell me, it's a little bit confusing when I
15 look at the records, how many Winecki brothers were
16 there?

17 A. Three.

18 Q. Do you recall their names?

19 A. One was Danny and Amo, and there was one more. Might
20 be on here.

21 MS. TRINA KERVIN: Art.

22 THE WITNESS: Art.

23 MS. ADAMS: For the record, I just

24 want to state who said that. I believe it was Mrs.

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1 Uchniat's daughter, Trina Kervin.

2 MR. WENDT: She helped you out.

3 MS. ADAMS: Thank you.

4 Q. (By Ms. Adams, continuing:) Did you ever have an
5 agreement with any of those three brothers that they
6 would bring all of their waste to the G & H facility?

7 A. No.

8 Q. Was an agreement of this nature ever contemplated?

9 A. No, not that I know of.

10 Q. Did G & W usually use G & H Land Fill?

11 A. Yes.

12 Q. Did they use any other Land Fills in the area?

13 A. I couldn't tell you that.

14 Q. Do you know for whom they transported waste?

15 A. No.

16 Q. I am going to ask you some names and see if this
17 refreshes your memory. It may not.

18 Do you know if they ever brought
19 in waste for Aristo Corporation?

20 A. No, I don't know.

21 Q. Do you know if they brought waste for Delta
22 Refractories?

23 A. I don't know that.

24 Q. Do you know if they brought waste for Export

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1 Processing?

2 A. I don't know.

3 Q. Do you know if they brought waste for Worford Drum
4 Company?

5 A. Worford Company rings a bell with me.

6 Q. Do you recall if they hauled waste for Shimerhorn Paint
7 Products Incorporated?

8 A. No, I don't.

9 Q. Do you recall if they hauled waste for Minnesota Mining
10 and Manufacturing?

11 A. I think Danny hauled waste for them.

12 Q. Do you recall if they hauled for Magnus?

13 A. I don't know.

14 Q. Do you know what type of waste they brought?

15 A. Danny brought that liquid in.

16 Q. Do you know what type of waste that liquid was?

17 A. No, I don't.

18 Q. Do you recall if it had a particular color?

19 A. No, I don't.

20 Q. Did it have a strong smell?

21 A. Not that I know.

22 Q. Are you familiar with the location, I believe it's
23 Mound and Davision Road?

24 A. I am familiar with the location.

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- 1 Q. Do you know if there is a company located there?
- 2 A. I don't know.
- 3 Q. Do you know if you ever took any waste from a company
- 4 that's located there?
- 5 A. I don't know.
- 6 Q. Do you know Wallace Geneca?
- 7 A. No.
- 8 Q. Do you know if G & W stood for the initials of the
- 9 owners, for example, W did that stand for Winecki?
- 10 A. I don't know.
- 11 Q. Do you know if G & W Trucking is still in existence?
- 12 A. I don't know.
- 13 Q. Do you know where it was located?
- 14 A. No.
- 15 Q. How much waste did they bring on to the site?
- 16 A. I don't know.
- 17 Q. Did they come once a week?
- 18 A. I'd say that. I'd say once a week.
- 19 Q. When they came in, was it usually liquid waste?
- 20 A. Yes.
- 21 Q. Was it ever solid waste?
- 22 A. No. Art on there, he use to come everyday. See,
- 23 that's three brothers we are talking about.
- 24 Q. Right. Okay. Did Art also bring liquid waste?

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- 1 A. Yes.
- 2 Q. And do you know where he brought it from?
- 3 A. No, I don't.
- 4 Q. Is Art affiliated with G & W?
- 5 A. Well, it's one of the three brothers.
- 6 Q. Were all three brothers involved with G & W?
- 7 A. I don't know if they were involved with G & W. I know
- 8 they were all in the waste business.
- 9 Q. Was there also a Winecki brother or Winecki brother
- 10 named Edwin?
- 11 A. Yes.
- 12 Q. Were the three brothers' names then Danny, Edwin and
- 13 Art?
- 14 A. Yes. And is what they call Art. Eddie is dead.
- 15 Q. Okay. Thank you.
- 16 Do you know where Art Winecki is
- 17 located now?
- 18 A. No, I don't.
- 19 Q. Do you know where Danny Winecki is located now?
- 20 A. He lives in Warren, that's about all I can tell you.
- 21 Q. Okay. Did Edwin bring in liquid waste?
- 22 A. Yes.
- 23 Q. Do you know where he got his liquid waste from?
- 24 A. No, I don't.

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1 Q. And how often did he come?

2 A. Maybe once a day.

3 Q. These liquid wastes that they brought in, you don't
4 recall if there was a color?

5 A. No, I don't.

6 Q. Or an odor associated with them?

7 A. No, I don't.

8 Q. Do you recall any business transactions with Getor
9 Trucking?

10 A. Yes.

11 Q. Do you know who owned and operated Getor Trucking?

12 A. No, I don't.

13 Q. Do you recall any employees of Getor Trucking?

14 A. No.

15 Q. Do you know who they hauled waste for?

16 A. No, I don't.

17 Q. Do you recall the type of waste they use to bring in?

18 A. Yes, rubbish.

19 Q. Did they ever bring in any liquid waste?

20 A. No.

21 Q. Did they ever bring in waste from Waste Management?

22 A. I don't know.

23 Q. Did they bring any waste from Borman Foods?

24 A. I don't know that either.

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- 1 Q. Do you know if they brought any waste from Great
2 Scott's?
3 A. I don't know.
4 Q. Do you know if Getor Trucking was sold to Waste
5 Management?
6 A. I don't know.
7 Q. Do you recall any business transactions with General
8 Oil Company?
9 A. Yes.
10 Q. Do you recall who owned and operated General Oil
11 Company?
12 A. No.
13 Q. Do you recall any employees with whom you had contact?
14 A. No, I don't.
15 Q. Do you know from whom they brought waste to your
16 facility?
17 A. No.
18 Q. Do you recall the type of waste that they brought?
19 A. Liquid.
20 Q. Was this also waste oil?
21 A. Yes.
22 Q. Did they bring anything other than waste oil?
23 A. That's all. Lots of times they use to oil our roads.
24 Q. Where did these waste oils go on the facility?

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- 1 A. In the pits.
- 2 Q. They also went into the pit?
- 3 A. Yes.
- 4 Q. How often did American Waste Oil come out to the G & H
- 5 Land Fill?
- 6 A. Maybe once a week.
- 7 Q. And how often did General Oil Company come out?
- 8 A. General Oil, oh, they use to come out maybe once a
- 9 week.
- 10 Q. Did General Oil Company have transactions with you
- 11 throughout the operation of the G & H Land Fill?
- 12 A. No.
- 13 Q. Was this for last time then?
- 14 A. Yes, it was.
- 15 Q. Do you recall how long?
- 16 A. No, I don't.
- 17 Q. Did General Oil Company ever have anybody named ML
- 18 Asberry haul waste?
- 19 A. I don't know.
- 20 Q. Did they bring anything other than the waste oil?
- 21 A. No, that's all.
- 22 Q. Do you know where they were located at the time?
- 23 A. No, I don't.
- 24 Q. Did you have any transactions with Herb's Oil Company?

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- 1 A. Herb's Oil Company?
- 2 Q. Yes.
- 3 A. Not that I can remember.
- 4 Q. Do you recall any transactions with Herbert Hanna?
- 5 A. No, I don't.
- 6 Q. Do you recall any business transactions with J & B
- 7 Disposal?
- 8 A. J & B? I remember the name.
- 9 Q. Do you recall who owned or operated it?
- 10 A. No, I don't.
- 11 Q. Do you recall any employees with whom you had contact?
- 12 A. No.
- 13 Q. Do you know the type of waste they brought in?
- 14 A. No, I don't.
- 15 Q. Was it residential rubbish?
- 16 A. I don't know.
- 17 Q. Do you know who they hauled waste for?
- 18 A. No, I don't.
- 19 Q. Do you know how often you dealt with J & B Disposal?
- 20 A. No.
- 21 Q. Would you say it was once a month?
- 22 A. I don't know.
- 23 Q. And how long did you transact business with them, of
- 24 the entire life of this G & H Land Fill?

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- 1 A. No.
- 2 Q. Less than?
- 3 A. Yes.
- 4 Q. Do you recall any business transactions with Justice
- 5 Trucking Company?
- 6 A. Yes.
- 7 Q. Do you know who owned and operated Justice Trucking
- 8 Company?
- 9 A. No, I don't.
- 10 Q. Are you familiar with Maurice Justice?
- 11 A. Yes.
- 12 Q. Did he own Justice Trucking Company?
- 13 A. His dad owned it.
- 14 Q. Do you know what his dad's name was?
- 15 A. No, I don't.
- 16 Q. Do you know for whom they hauled waste?
- 17 A. No, I don't.
- 18 Q. Do you recall if they hauled waste for Rechill (sp)
- 19 Chemical?
- 20 A. I don't know.
- 21 Q. Do you know if they hauled waste for Florian Cleaners?
- 22 A. I don't know.
- 23 Q. Do you know the waste types that they brought in?
- 24 A. Drums.

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- 1 Q. If it came in drums, does that mean it was liquid
2 waste?
3 A. Yes.
4 Q. Do you know the type of waste?
5 A. No, I don't.
6 Q. Do you recall if any of the waste was undercoatings?
7 A. No, I don't.
8 Q. Do you know if it was any chemicals of any kind?
9 A. I don't think chemicals, but they could have been.
10 Could have been undercoating, could have been that.
11 Q. Do you know if Justice Trucking also brought waste to
12 LDI?
13 A. I don't know.
14 Q. If LDI was closed, would Justice Trucking bring waste
15 to your facility?
16 A. I don't know.
17 Q. Do you recall how often Justice Trucking Company
18 brought waste to you?
19 A. One load a day.
20 Q. Do you recall if it was liquid waste?
21 A. Liquid.
22 Q. Was it ever solid waste?
23 A. No.
24 Q. Was there a color associated with the liquid?

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1 A. No.

2 Q. Was there an odor ever associated with the liquid?

3 A. No.

4 Q. Did anybody ever bring waste on to your site that had a
5 particular powerful smell?

6 A. No, not that I know of. I wasn't down the hill, I was
7 up in the office. I would have no way of smelling that
8 stuff.

9 Q. Okay. We have discussed Oscar Kramer before. You knew
10 Oscar Kramer?

11 A. Yes.

12 Q. Did Oscar Kramer operate Kramer Waste Materials?

13 A. I think Harold and Oscar were brothers together in
14 that. I think, I'm not sure.

15 Q. Okay. Do you know the type of waste that Kramer Waste
16 brought?

17 A. Liquid.

18 Q. Was it always liquid?

19 A. Yes.

20 Q. Do you know from whom they got that liquid waste?

21 A. No, I don't.

22 Q. Do you know if they got it from Central Quality?

23 A. I don't know.

24 Q. Do you know if they got it from Utility Enameling?

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- 1 A. I don't know.
- 2 Q. Do you know if it was Kirlin?
- 3 A. I don't know.
- 4 Q. Do you know if they got it from Rinshid-Mason (sp)?
- 5 A. I don't know.
- 6 Q. This liquid waste, was it paint or paint thinners?
- 7 A. I don't know what it was.
- 8 Q. Do you know if it was waste oil?
- 9 A. I don't know that.
- 10 Q. Would it just be termed sludge?
- 11 A. Sludge.
- 12 Q. How often did Kramer Waste Materials come out to the
- 13 facility?
- 14 A. I don't remember.
- 15 Q. Do you know if it was once a week?
- 16 A. No, I don't know. Might have been more. Might have
- 17 been less.
- 18 Q. Was it frequent, do you think?
- 19 A. Not too frequent, no.
- 20 Q. Perhaps once a month?
- 21 A. Oh, more than that. I would say a couple of times a
- 22 month.
- 23 Q. Do you know if Kramer Waste Materials was ever sold?
- 24 A. I don't know.

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1 Q. Do you know where it was located at the time that you
2 had transactions?

3 A. No, I don't.

4 Q. Do you know if it is still in existence?

5 A. I don't know.

6 Q. Did you deal with Kramer Waste throughout the time of
7 your operation?

8 A. No.

9 Q. Okay. Did you have any transactions with M & L General
10 Trucking Company?

11 A. We did, but I don't know what.

12 Q. You do not recall the type of waste they brought out?

13 A. No, I don't.

14 Q. Do you know if it was solid?

15 A. I don't know.

16 Q. Do you know for whom they hauled?

17 A. I don't know that either.

18 Q. Do you know who owned or operated it?

19 A. No.

20 Q. Do you know where it was located at the time you dealt
21 with them?

22 A. No.

23 Q. Do you know if it is still in business?

24 A. I don't know.

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1 Q. Do you recall William Travis?

2 A. No.

3 Q. Do you recall any dealings with Raymond Malow? We
4 discussed him earlier.

5 A. William Malow?

6 Q. Raymond Malow?

7 A. Ray Malow, yes.

8 Q. Did Ray Malow ever bring any waste from Chirco Homes?

9 A. I don't know if they brought it from Chirco Homes or
10 not. Chirco Homes dealt with me themselves.

11 Q. What type of waste did Ray Malow bring?

12 A. Oh, from building homes.

13 Q. Any liquid waste?

14 A. No.

15 Q. Do you recall any transactions with Mid Eastern
16 Disposal Company?

17 A. Yes.

18 Q. Do you know who owned or operated Mid Eastern Disposal
19 Company?

20 A. No, I don't.

21 Q. Do you recall any employees with whom you dealt with at
22 Mid Eastern Disposal?

23 A. No, I don't.

24 Q. Do you know what type of waste they brought?

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- 1 A. Liquid.
- 2 Q. Do you know from whom they got that liquid waste?
- 3 A. No, I don't.
- 4 Q. Do you know if it was paints or paint thinners?
- 5 A. I think it was oils.
- 6 Q. Was it waste oils?
- 7 A. Yes.
- 8 Q. Do you know for whom they transported these waste oils?
- 9 A. No.
- 10 Q. Do you know if they ever transported for General Motors
- 11 Truck and Couch?
- 12 A. I don't know.
- 13 Q. Did you know Robert Ewald?
- 14 A. No.
- 15 Q. How many times did Mid Eastern Disposal come out to
- 16 your facility?
- 17 A. Mid Eastern, maybe 3 or 4 times.
- 18 Q. Did you conduct business with them throughout the
- 19 operation of your facility?
- 20 A. No.
- 21 Q. Do you recall any transactions you had with Modern
- 22 Waste?
- 23 A. Modern Waste, yes.
- 24 Q. Do you recall who ran and operated Modern Waste?

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- 1 A. I believe it was one of the Evenhouse boys, but I don't
2 know which one.
- 3 Q. Do you recall where they were located?
- 4 A. John Evenhouse.
- 5 Q. Do you recall where it was located?
- 6 A. No.
- 7 Q. Do you know if it's still in business?
- 8 A. No, I don't. I don't know.
- 9 Q. Do you know for whom they hauled waste?
- 10 A. Yes. It's from stores and stuff like that.
- 11 Q. Did they bring anything other than residential or
12 produce rubbish?
- 13 A. I don't know.
- 14 Q. I just want to go back to Mid Eastern Disposal. I am
15 not sure if I asked you.
- 16 Do you know where they were
17 located at the time?
- 18 A. No, I don't.
- 19 Q. Do you know if they are still in business?
- 20 A. I don't know.
- 21 Q. Do you recall any transactions with Municiple Disposal?
- 22 A. I remember the name.
- 23 Q. Do you recall the type of waste that they brought?
- 24 A. No, I don't.

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- 1 Q. Do you know who the owner or operator was?
- 2 A. No.
- 3 Q. Do you know where it was located at the time you had
- 4 dealings with them?
- 5 A. No, I don't.
- 6 Q. Was it also known as Midwest Sanitation?
- 7 A. I don't know.
- 8 Q. Do you know how often they use to come out to your
- 9 facility?
- 10 A. No, I don't.
- 11 Q. Do you recall any transactions with New Berg Disposal?
- 12 A. Who?
- 13 Q. New Berg Disposal?
- 14 A. New Berg or Newbury.
- 15 Q. New Berg?
- 16 A. No, I don't remember a New Berg.
- 17 Q. Do you recall a Gerald Newbury (sp)?
- 18 A. Yes. He's also deceased.
- 19 Q. Do you know what type of waste he brought?
- 20 A. Home rubbish.
- 21 Q. Did he bring anything else?
- 22 A. No.
- 23 Q. Do you recall any transactions with Reitzloff Refuse?
- 24 A. Yes.

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1 Q. Do you know who owned or operated Reitzloff Refuse?

2 A. There were two or three Reitzloff boys, but I don't
3 remember their first names.

4 Q. Do you recall the type of waste that they brought?

5 A. They brought solids and they brought liquids both.

6 Q. Do you know from whom they got these waste?

7 A. No, I don't.

8 Q. Do you know if it was a paint or paint thinners?

9 A. I don't know.

10 Q. Or a waste oil?

11 A. I don't know.

12 Q. Do you know if Reitzloff Refuse was sold?

13 A. I don't know that either.

14 Q. Do you know if it's been associated with Waste
15 Management?

16 A. I don't know.

17 Q. How often would Reitzloff Refuse come to the G & H Land
18 Fill?

19 A. You mean to dump the dry rubbish?

20 Q. I am a little bit more interested in the liquid, but
21 sure.

22 A. Maybe once a day.

23 Q. For the liquid?

24 A. Yes.

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1 Q. How often did they come with the solids?

2 A. Once a day.

3 Q. Was there any particular odor or color associated with
4 Reitzloff?

5 A. Not that I know.

6 Q. Do you recall having any transactions with Schoof
7 Sanitation Company?

8 A. Yes.

9 Q. Do you know who owned and operated it?

10 A. Al Schoof. I think it's in Mount Clemens.

11 Q. Pardon me?

12 A. I believe he's from Mount Clemens.

13 Q. Was he located in Mount Clemens back in the time you
14 were associated with him?

15 A. Yes.

16 Q. What kind of waste did Schoof Sanitation bring?

17 A. He use to bring some dye and some liquids.

18 Q. Do you know from where he got these waste?

19 A. No, I don't.

20 Q. Do you recall if there was a color or an odor to the
21 liquid waste?

22 A. No, I don't.

23 Q. Do you know Raymond Schoof?

24 A. No.

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1 Q. How often did Schoof Sanitation Company come out?

2 A. Not that often, maybe once. Maybe once a day with
3 their solids, but they didn't have too much liquid. I
4 don't remember how often they would come with that.

5 Q. I believe we discussed this person before, so we will
6 just touch on it once more.

7 Do you recall any transactions
8 with Al Schultz and Sons?

9 A. Yes.

10 Q. Did Al Schultz operate the Al Schultz and Sons Company?

11 A. Yes.

12 Q. What type of waste did they bring?

13 A. They brought solid and they brought some drums.

14 Q. Do you recall where they got these liquid wastes or
15 solid wastes from?

16 A. No, I don't.

17 Q. And, I am sorry. I think you answered this before, but
18 I forgotten the answer.

19 Do you know if H. Schultz is
20 related to Al Schultz?

21 A. I don't know.

22 Q. Do you know how often Al Schultz came to your facility?

23 A. Well, he use to bring dry rubbish about everyday, but
24 the drums I don't know how often he brought them, not

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1 very often.

2 Q. Do you recall where Al Schultz was located?

3 A. No, I don't.

4 Q. Do you recall any transactions with Stoney Creek
5 Disposal?

6 A. Yes.

7 Q. Do you know who owned or operated Stoney Creek?

8 A. No, I don't.

9 Q. Do you recall any employees with whom you had contact?

10 A. No.

11 Q. Do you know from whom they brought waste?

12 A. No.

13 Q. Do you recall the type of waste they brought?

14 A. Solid.

15 Q. Did they bring any liquids?

16 A. No.

17 Q. Are they affiliated in anyway with Manumint (sp)
18 Incorporated?

19 A. I don't know.

20 Q. Do you know Gus Compo?

21 A. Yes.

22 Q. Do you know who he was?

23 A. I think he's deceased.

24 Q. Was he associated with Stoney Creek Disposal?

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- 1 A. Yes, somehow through marriage.
- 2 Q. Did you say you think he's deceased?
- 3 A. I believe he is.
- 4 Q. Do you recall any transactions with Suburban Disposal?
- 5 A. Yes.
- 6 Q. Do you recall the waste type that they brought in?
- 7 A. Solid.
- 8 Q. Did they bring in any liquids?
- 9 A. No.
- 10 Q. Do you know who owned or operated it?
- 11 A. No, I don't.
- 12 Q. Do you know where they were located at the time that
- 13 you dealt with them?
- 14 A. No, I don't.
- 15 Q. Do you recall any transactions with Tringali Sanitation
- 16 Incorporated?
- 17 A. Yes.
- 18 Q. Do you know who owned or operated Tringali?
- 19 A. Dominic Trangali.
- 20 Q. Do you know for whom he brought waste to the site?
- 21 A. No, I don't.
- 22 Q. Do you know if ever brought waste from the Ditzler
- 23 Paint Company?
- 24 A. I don't know.

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1 Q. Do you know where it was located at the time you dealt
2 with them?

3 A. Dequindre in Warren.

4 Q. In Warren. I am sorry, did you say a street name?

5 A. D-e-q-u-i-n-d-r-e, Dequindre.

6 Q. Do you know the type of waste that they use to bring
7 in?

8 A. Well, mostly solid.

9 Q. Did they ever bring in any liquid?

10 A. I am not sure.

11 Q. Do you know how often Tringali Sanitation use to come
12 to G & H?

13 A. Once a day.

14 Q. Do you recall having any transactions with Usher Oil
15 Company?

16 A. No, I don't.

17 Q. Do you recall any transaction with Fuel Oil
18 Corporation?

19 A. No.

20 Q. Did you know anybody named Morris Usher?

21 A. No.

22 Q. Did you have any transaction with Utica Disposal?

23 A. Yes.

24 Q. Do you know who owned or operated?

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- 1 A. Angelo Lociccero.
- 2 Q. What type of operation is Morris Usher?
- 3 A. Home rubbish.
- 4 Q. Did they bring only liquids?
- 5 A. No. They are three boys in that, Tom, Angelo, there's
- 6 another one but I forgot what his name was.
- 7 Q. Do you know if they ever hauled waste from the Utica
- 8 Packing Company?
- 9 A. I don't know.
- 10 Q. Do you recall any transactions with Warren Trucking?
- 11 A. I remember the name but that's it.
- 12 Q. You don't remember the type of waste that they brought?
- 13 A. No.
- 14 Q. Or from whom they brought waste?
- 15 A. No, I don't.
- 16 Q. Do you know where they were located when you dealt with
- 17 them?
- 18 A. No.
- 19 Q. Do you recall any transactions with Waste Authority?
- 20 A. No, I don't.
- 21 Q. Do you recall any transactions with Waste Management
- 22 Incorporated?
- 23 A. Waste Management?
- 24 Q. Yes.

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- 1 A. No, I don't.
- 2 Q. Do you recall any transactions with -- I am not sure
- 3 how to pronounce it W-i-e-r-i-n-g-a?
- 4 A. Yes.
- 5 Q. Do you know who owned or operated it?
- 6 A. No, I don't.
- 7 Q. Do you know which employee you came in contact with?
- 8 A. No, I don't.
- 9 Q. Do you know the type of waste they brought?
- 10 A. Solid.
- 11 Q. Did they bring in any liquid waste?
- 12 A. No.
- 13 Q. Do you know from whom they brought this waste?
- 14 A. No, I don't.
- 15 Q. Do you know how often they came to your facility?
- 16 A. I would say once a day.
- 17 Q. Do you recall any transactions with Winkler
- 18 Construction Company?
- 19 A. Winkler Construction?
- 20 Q. Yes.
- 21 A. I had a Winkler ~~dumping~~ with me, but I forgot which
- 22 one.
- 23 Q. Do you recall what type of waste?
- 24 A. No, I don't.

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1 Q. Do you know if they were bringing their own waste or
2 whether they were bringing somebody else's waste?

3 A. I don't know.

4 Q. Do you know where they were located when you dealt with
5 them?

6 A. No.

7 Q. Did your company have trucks that ever went out and
8 picked up waste from a different facility?

9 A. Well, when we first got the contract with Thompson
10 Products we use to go pick up the barrels from them.

11 Q. Did you pick up from anyone else?

12 A. No.

13 Q. Do you recall any transactions with Wooster Industrial
14 Service?

15 A. No, I don't.

16 Q. Do you recall any transactions with National Asphalt?

17 A. No. We did have an asphalt company, but I don't think
18 it was National.

19 Q. Do you recall the name?

20 MR. WENDT: You said National
21 Asphalt here.

22 THE WITNESS: Okay. It was
23 National.

24 Q. (By Ms. Adams, continuing:) Do you know what type of

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1 waste they brought?

2 A. No, I don't.

3 Q. Were they bringing their own waste or somebody else's
4 waste?

5 A. I don't know.

6 Q. And you don't recall if it was a liquid waste?

7 A. No, I don't think it was liquid.

8 Q. Do you know how often you got waste from this National
9 Asphalt?

10 A. No, I don't.

11 Q. Do you recall any transactions with R.R. White
12 Incorporated?

13 A. R.R. White, it rings a bell with me, but I don't
14 remember.

15 Q. Do you recall what type of waste?

16 A. I don't remember what he brought in.

17 Q. Do you know who owned and operated R.R. White?

18 A. No, I don't.

19 Q. Do you know where it was located at the time you had
20 transactions with them?

21 A. No, I don't.

22 Q. Do you know who operated National Asphalt?

23 A. No.

24 Q. All right.

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1 MS. ADAMS: I would like to take
2 just a few moments just to go through my stuff and make
3 sure we touched everything. Off the record.

4 (Off the record)

5
6 MS. ADAMS: Back on the record.

7 Q. (By Ms. Adams, continuing:) We just have last
8 questions. We are a little bit vague because I didn't
9 ask the question perfectly.

10 You indicated that you had
11 received waste from United States Rubber Company and I
12 think you specifically mentioned tires?

13 A. Yes.

14 Q. Were there any fires involved with these tires?

15 A. Not that I remember.

16 Q. Okay. Did you ever burn the tires on your facility?

17 A. No.

18 Q. Did you bury all the tires that came on to your
19 facility?

20 A. Yes.

21 Q. Okay. And then there is some question about Acme Paint
22 Company and Acme Quality Paints. As you can imagine
23 both companies are going to be very upset because we
24 didn't know which one it is.

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1 Could it possibly have been Acme
2 Quality Paints who manufactured paints in the Detroit
3 area that sent waste to you?

4 A. I really don't remember.

5 Q. So as far as you know, it could be either Acme Quality
6 Paints or Acme Paint Company?

7 A. Yes, as far as I know.

8 Q. All right. That's fine. I just wanted to make that
9 clear for other people's sake.

10 You also indicated that a lot of
11 the liquid waste that was coming on to your facility
12 you noted was more in the first part of your operation
13 rather than at the end of your operation.

14 When you say the first half, what
15 do you mean by first half?

16 A. The first years before they stopped us from taking
17 liquids.

18 Q. Who stopped you from taking liquids?

19 THE WITNESS: Who was it, Bill?

20 MR. WENDT: I don't remember, to
21 tell you the truth.

22 THE WITNESS: Macomb. I don't
23 know who stopped us, but somebody did.

24 Q. (By Ms. Adams, continuing:) Was it a Court Order?

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1 A. No.

2 Q. But it was a governmental agency that required that you
3 stop accepting the liquid waste?

4 A. I guess. I told them that if they could prove to me
5 that it was doing what they said it was and I'd stop.
6 They never did prove it to me, so I never did stop. So
7 then they came out and stopped me legally.

8 Q. You indicated that Danny Winecki brought waste from 3M?

9 A. Yes, I think it was 3M.

10 Q. Okay. Was that waste that came from 3M liquid waste?

11 A. Yes, that's all Danny brought was liquid.

12 Q. Okay. And then I am a little bit confused. I think
13 this is my fault.

14 Did you have pits that were for
15 paints and paint thinners and then pits that were for
16 waste oils?

17 A. No, paint thinners. The paint or whatever it was in
18 those barrels, which we don't know exactly what was in
19 them, we called it sludge, and it all went in the one
20 pit, and when we filled the pit, we covered it and dug
21 another one.

22 Q. Okay. Have you had any transactions with Statewide
23 Photographic and Plate Services?

24 A. Not that I know of, no.

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1 Q. Did you have any transactions with Statewide Aluminum
2 Company?

3 A. I don't remember if I did or not.

4 Q. So you don't recall if they sent you any liquid waste?

5 A. No.

6 MS. ADAMS: I believe that's all
7 the questions that I have. Does anybody else have any
8 questions?

9 MR. WENDT: We can clear up a
10 point that was raised early on about licensing and the
11 impression may have been left by the Witness that the
12 State didn't license but the County did. My
13 recollection, and of course this is subject to your
14 recollecting the same thing, is that that Macomb Health
15 Department operated as an agent of the State in
16 granting the permits for Land Fills, and so it was a
17 State License and the agent for that was the Macomb
18 County Health Department;

19 MS. ADAMS: Okay. You have the
20 option if you want to get a copy of the transcript,
21 read and then sign it or you can waive the right of
22 reading it and signing it. It just gives you the
23 opportunity to look it over and says things that you
24 think that you did say here in the deposition today.

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1 Would you like the right to sign
2 it?

3 THE WITNESS: What do you say?

4 MR. WENDT: Well, we are going to
5 get a copy. We will get a copy. You are going to get
6 a copy or your people and your compatriots. They do a
7 good job. I don't think you have to sign it. We can
8 waive the signature.

9 THE WITNESS: You can waive the
10 signature.

11 MS. ADAMS: Okay. That will
12 conclude the deposition of Dorothy Uchniat. Thank you
13 very much.

14
15
16
17 (Deposition concluded at
18 2:25 p.m.)

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I do further certify that the signature of the witness to said deposition was waived by counsel for the respective parties.

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1 I do further certify that Dorothy
2 Kervin Uchniat was represented by Mr. William V. Wendt
3 and the United States Environmental Protection Agency
4 was represented by Ms. Laurie Donlon Adams.

5 I do further certify that I am not
6 connected by blood or marriage with any of the parties
7 or their attorneys or agents and that I am not an
8 employee of either of them, nor interested directly or
9 indirectly in the matters of controversy either as
10 counsel, agents or otherwise.

11 I do further certify that my
12 certificate annexed hereto applies to the original and
13 typewritten copies only, signed and certified
14 transcripts only. The undersigned assumes no
15 responsibility for the accuracy of any reproduced
16 copies not made under my control or direction.

17 *Sandra L. Krisfalusi*
18 SANDRA L. KRISFALUSI, CSR-0942
19 Notary Public, Macomb County
20 My Commission Expires: 8-30-92.

21 Dated: May 3, 1990,
22 Warren, Michigan
23
24

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